



**1 RAILSHEAD ROAD, OLD ISLEWORTH TW7 7EP**

**Application for Change of Use of part to residential use**

**DESIGN & ACCESS STATEMENT**

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Fig.1 - Image of Development

## Introduction

The application relates to the development that has taken place at the former Waterside Business Park at 1 Railshead Road, Old Isleworth, St Margaret's.

This site was acquired initially by Pittville Developments LLP (a St. Marks Homes PLC/Mizen Properties Limited JV). Pittville implemented and constructed the mixed-use Consented Scheme, completing the Development March 2017. The long leasehold interest of the ground and first floor commercial space, resides in Railshead Commercial Limited, the applicant. The Ground Floor (shell and core) is leased to Mizen Design Build Limited, MDB (a Mizen Group company), which company completed its own fit-out in the period March – July 2017 at which date it occupied the entire.

This application has been prepared by FORMstudio architects on behalf of current property owners Railshead Commercial Limited for a change of use of the unlet commercial space within the building at first floor to be converted to a residential use.

## Mizen Group

Mizen is a London based privately-owned property development and investment company founded in 1986. The group offers a wide range of services that include Design, Construction, Civil Engineering, Property Development, and Property Management, and has significant experience in Land Acquisition, Project Design & Construction, Project Management and Finance.

Mizen has been nominated for many awards including LABC Building Excellence Awards (Park Tavern, Tottenham, 2012) for the Best Major Housing Development; Green Apple Award (Summer 2010) for the built environment (Ave Maria Hall / St. Winifride's Hospice, Wales); 2degrees Champions Award (Runner-Up, 2014) for sustainable development (Kingston Road, New Malden) and LABC Awards 2015 (Finalist) for Best Social or Affordable New Housing Development (Kingston Road & Caro Place, New Malden).

## FORMstudio

FORMstudio is a London Bridge based Chartered Architect practice extensively working in the private residential and residential development sectors. Originally founded as a partnership in 1983 by Malcolm Crayton, Jeremy Lingard and Graham Wright, the practice incorporated in 1997 as FORM Design Architecture Ltd and trades as FORMstudio.

FORMstudio have completed numerous mixed use and residential developments and have been working with Mizen Group since 2010 as executive architects for the design and build wing. The practice was chosen by Mizen to take forward the implementation of the consented scheme (by Goldcrest Architects) at Railshead Road and were able to do so adhering strictly to the design intent of the original proposals.

## Cunnane Town Planning LLP

Established in 1985 by Senior Partner, Joe Cunnane, the Richmond based practice has become a well respected, independent town planning consultancy with offices in London and Manchester, and three associated offices in Ireland.

Cunnane Town Planning worked on the town planning aspects during the implementation phase of the Railshead Road development.



**Site Location and Context**

The application site is located within the St Margaret’s area of Richmond-Upon-Thames and borders the River Crane. It falls in the edge of the St. Margaret’s Estate Conservation Area.

The site has an area of approximately 0.21ha and is enclosed to the north by the River Crane and adjacent to the mixed use development of Charleville Mews/Riverside House. Further east of this is the River Thames which is designated Metropolitan Open Land and a Site of Nature Importance. The site is bounded to the south and west by Railshead Road and St Margaret’s Road/Richmond Road respectively.

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Fig. 2 - Aerial view of site location.

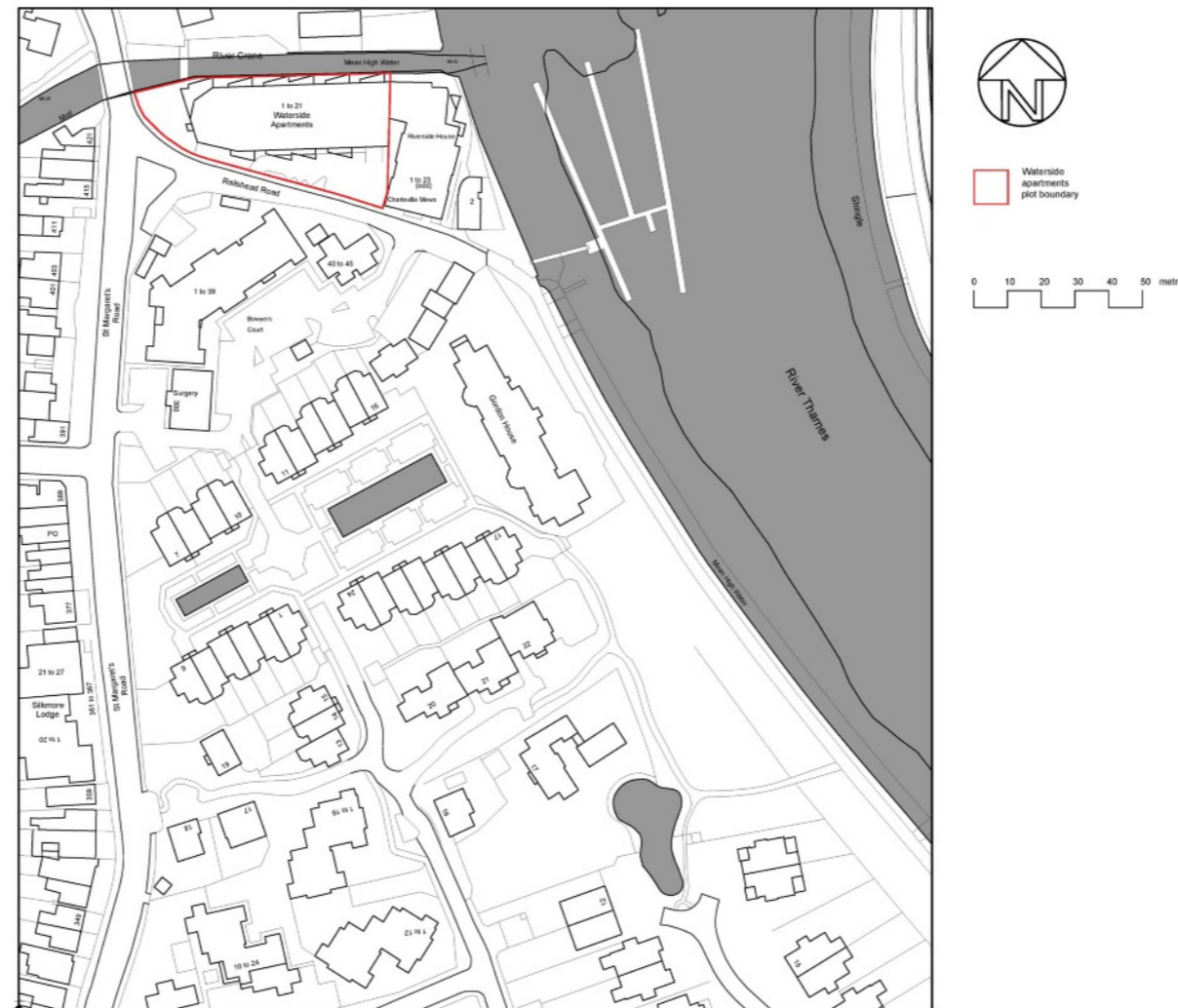


Fig. 3 - Map of site location.

## Site Location and Context Continued

The site is located 0.7 mile from St. Margaret's station and 1 mile from Isleworth with the H37 bus stopping directly outside the site and connecting both these stations and Richmond to Hounslow (peak frequency every 6 minutes).

The original development proposals were the subject of extensive public consultation and discussions with local stakeholders / groups within the local community. There was also pre-application consultation with the Council which resulted in significant changes to the schemes.

The consented scheme as built is 3 storeys above ground with a setback 4th storey element.

The development has a total of 21 units, ranging from one bed, one bed wheelchair adaptable, two bed, and three bed units.

There are 4 large one bed wheelchair adaptable units which equates to 19% of total units. All dwellings meet the London Plan [2011] and Richmond Council's Design Standards, with the majority of dwellings exceeding the minimum space standards. The scheme was designed to Code for Sustainable Homes - Code Level 4.

The development provides a high standard of accommodation with good quality private and communal amenity space throughout. Although the site is constrained, the design maximises the potential for views towards the north and south with projecting angled bays looking towards the River Thames, making most of the river views. The high quality of the design has ensured the amenity of neighbours is protected.

Ground floor accommodation was made commercial space in order to address flood risk concerns.

The four wheelchair accessible units are fully adaptable, together with provision of five disabled parking bays to ensure that the scheme is fully compliant and easily accessible. There are three disabled parking bays in the basement and two disabled bays on the ground floor level.

There are a total of 38 parking spaces (including the 5 No disabled parking bays) in the scheme as built. 24 parking bays intended for the private apartments and 14 spaces for the commercial space.



Fig. 4 - Diagram showing relative position of nearby stations.

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Fig. 5



Fig. 6

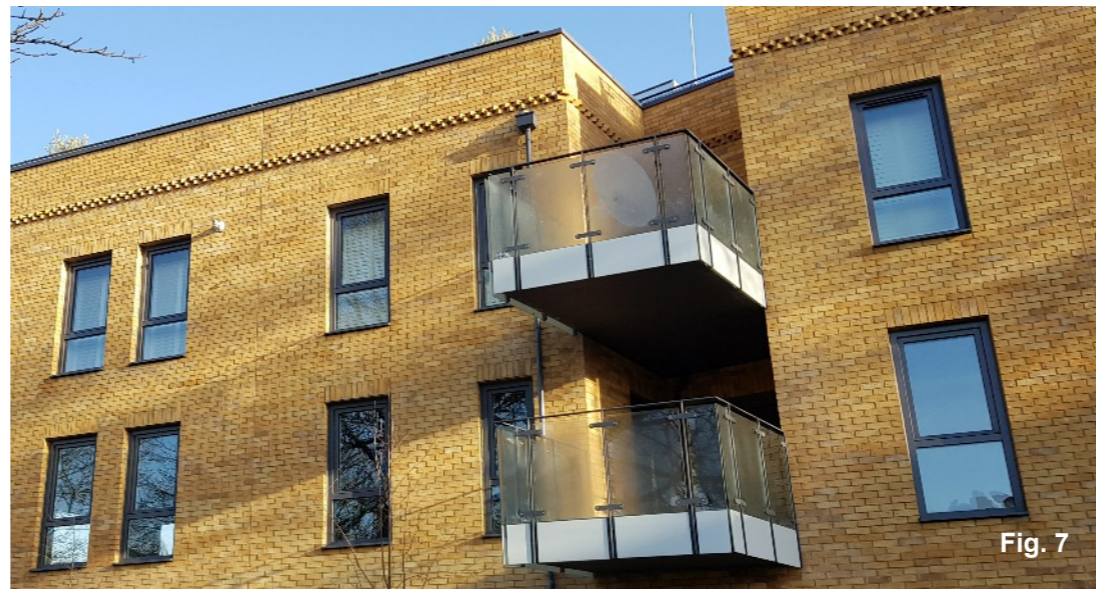


Fig. 7



Fig. 8

## Planning History

There is an extensive planning history in relation to the site. Key applications are:

In 2000 an application was submitted for the redevelopment of the site by way of renewal of an earlier application. The application was never determined.

In 2003 an application to redevelop the site by the erection of 18 residential units was withdrawn. A subsequent application, also in 2003, was refused and the later appeal also withdrawn.

On 1st August 2014 permission was granted under reference 13/3390/FUL for a residential scheme comprising 27 residential units and 4 live/work units.

On 1st August 2014 permission was granted under reference 13/3388/FUL for a mixed use scheme comprising 21 residential units with 1355 m2 of B1 commercial space – the implemented scheme.

On 10th August 2016 permission was granted under reference 16/1302/VRC to change the third floor fenestration of the building, and the conditions applicable to earlier approvals were carried forward with new reference numbers.

On 24th July 2019 permission was granted under reference 18/1289/VRC for removal of condition U09619 re provision of a Play Space, in lieu of provision at another location in the borough funded by the applicant.

## Planning policy

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires the determination of planning applications to be made in accordance with the relevant Development Plan, unless material considerations indicate otherwise. The relevant Local Development Plan for London Borough of Richmond upon Thames comprises;

- The London Plan
- London Borough of Richmond upon Thames Local Plan.

In addition, the National Planning Policy Framework (NPPF), National Planning Practice Guidance (NPPG) and Technical Housing Standards provide strategic guidance and are important material considerations in the determination planning applications. Each of these documents are reviewed in more detail below. Also there are a number of local level material considerations such as SPG's and SPD's that may be referred to during the consideration of a planning application.

## National Guidance

### *National Planning Policy Framework*

The National Planning Policy Framework ("NPPF") was first published on 27 March 2012 (updated July 2018 and February 2019). The NPPF is a material consideration in planning decisions.

The framework contains a number of general policies of relevance. At the heart of the Framework is a presumption in favour of sustainable development. Paragraph 11 states that the purpose of the planning system is to contribute to the achievement of sustainable development, and that there shall be a presumption in favour of such development. Sustainable development has three overarching objectives; economic, social and environmental.

The presumption in favour of sustainable development requires local authorities to provide for objectively assessed needs for housing and states that this means '*approving development proposals that accord with an up to date development plan without delay*'. Where there are no relevant development plan policies or policies are out-of-date permission should be granted, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

The NPPF, at paragraph 38 goes on to state that local planning authorities should approach decisions on proposed development in a positive and creative way seeking to approve applications for sustainable development where possible.



The NPPF at Section 5, sets out the requirement for local authorities to deliver a sufficient supply of homes. Setting out the Government's objective of significantly boosting the supply of homes, where land can come forward where it is needed.

In relation to affordable housing, the NPPF is clear that where a need is identified it is expected to be met on site unless an off-site contribution in lieu can be robustly justified, or the agreed approach contributes to the objective of creating mixed and balanced communities.

Importantly, paragraph 68 of NPPF states that small and medium sized sites make an important contribution to meeting housing requirements and are built out relatively quickly. Local planning authorities are encouraged to promote the development of a good mix of sites including windfall sites. The document goes on at paragraph 117 to state that the government seeks the effective use of land in meeting the needs for new homes, and that as much use as possible should be made of brownfield land. This is further emphasised in paragraph 118, which give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs. It also supports the development of underutilised land and buildings. The guidance at paragraph 121 is clear that local authorities should take a positive approach to applications for alternative uses of land, including supporting housing on retail and employment land where this does not undermine economic sectors or town centre viability.

The NPPF deals with design matters at Section 12 and states that good design is a key aspect of sustainable development. The guidance also requires that development that will add to the overall quality of the area; display good architecture, layout and landscaping; are sympathetic to local character; establish a strong sense of place and optimise the potential of the site will be supported.

#### *National Planning Practice Guidance*

The National Planning Practice Guidance ("NPPG") was published in March 2014. It is an Internet based resource contained a wide variety of information and guidance. The guidance and policies published here form a material consideration for planning decisions.

The guidance states that good design is an important and integral part of sustainable development, and that proposals should reflect this requirement.

The NPPG provides detailed advice with regard the approach that local planning authorities should take in relation to the undersupply of housing against requirements. It states that any undersupply should be dealt with in the first 5 years of the plan period where possible, and where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities to resolve the issue.

#### *Technical Housing Standards*

The government published these standards in March 2015, and they prescribe minimum space standards for all new dwellings. The standards set out not only provide minimum floor areas, but also key dimensions in new residential developments.

### **Local Policy and Guidance**

#### *London Plan (2016)*

The London Plan provides strategic objectives and policies for the region, and is an important part of the development plan. The key considerations for this proposal are contained in Chapter 3 where the plan identifies a need for 315 additional dwellings per year within the Borough. Policy 3.3 seeks to increase housing supply and states that Boroughs should seek additional development capacity through intensification, town centre renewal and mixed use redevelopment.

Policy 3.4 seeks to optimise housing potential, especially in accessible areas with good public transport links. Policy 3.5 requires that housing developments are of a high quality and should protect and enhance London's residential environment. Policy 3.8 requires a range of different homes that Londoners can afford.

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It is important to note the emerging London Plan which is intended to replace the 2016 plan, has been through an Examination in Public, which has been reported upon by the Inspector. The Mayor has considered the Inspector report and issued a further version of the plan which is being reviewed. The current stage of preparation is that the MHCLG and Secretary of State seek to informally agree text of new London Plan.

The emerging version of the London Plan seeks to increase the Boroughs housing target from 315 to 411 units per year, requiring the local authority to identify a larger number of sites for residential development. This has however been challenged by the London Mayor on the basis that this higher target is not ambitious enough. The outcome of this legal challenge is awaited.

#### London Borough of Richmond upon Thames Local Plan (2018)

The currently adopted Local Plan was adopted in July 2018. The policies of relevance to the determination of the application are as follows:

- Policy LP 1 concerns Local Character and Design Quality, developments are required to retain and enhance the character and heritage of the Borough. A key facet of this is to make best use of land.
- Policy LP 8 concerns Amenity and Living Conditions, the policy requires developments to protect the amenity of neighbouring and new occupants alike. Development should respect daylight and sunlight levels, avoiding overlooking, visual impact, noise and disturbance and enclosure.
- Policy LP 15 concerns protection and enhancement of biodiversity in the borough, achieved by supporting the incorporation and creation of new biodiversity features in development sites.
- Policy LP 20 concerns Climate Change Adaptation, requiring development to be resilient to climate change in order to decrease the vulnerability of both people and property.
- Policy LP 22 concerns Sustainable Design and Construction, requiring that development achieves the highest standards possible.
- Policy LP 24 concerns Waste Management, it requires that waste is managed in accord with the waste hierarchy to reduce, re use and recycle where possible. Provision for waste and recycling must be an integral part of developments.
- Policy LP 34 concerns the development of New Housing in the borough, and provides that a further 3,150 homes in the Borough is required during the plan period (2015-2025).
- Policy LP 35 considers the Housing Mix and Standards applied in new schemes, stating that a higher proportion of small units are suitable in town centres and Mixed Use areas. The policy is clear that all new developments should follow national space standards and provide sufficient amenity space.
- Policy LP 36 concerns Affordable Housing, and starts by requiring that 50% of all new housing be affordable and provided on site. However on smaller sites, the policy requires a financial contribution towards affordable housing on a sliding scale. For a scheme of 6 units that are replacing employment floor space, the policy sets out a contribution of 60% is required. The policy also confirms that the council will have regard to economic viability in considering proposals for less provision.
- Policy LP 40 concerns proposals on Employment Sites, and confirms that the Council will seek to retain land in the borough in employment use for business, industrial or storage purposes.
- Policy LP 41 is critical in the consideration of this application and concerns proposals for Offices. Part A of the policy contains a presumption against the loss of office floorspace in all parts of the borough. Outside the Key Office Areas, where a loss of office space is proposed, the application must include evidence in the form of a marketing report. This needs to satisfy the Council that there is no longer demand for an office use in this location and that there is unlikely to be such demand in the near future. This must include evidence of completion of a marketing exercise of the site over a minimum period of two continuous years. The marketing exercise must accord with the requirements of Appendix 5 of the Local Plan.

If a change of use proposal is considered to have been justified through the marketing evidence, a sequential approach to redevelopment or change of use will be applied. This requires that redevelopment for alternative employment uses (including social or community infrastructure) is first considered, followed by a mixed use scheme (including other community uses), and only after these have been considered is a residential scheme, with the maximum provision of affordable housing in accord with policy LP36 , acceptable.

- Policy LP 44 concerns Sustainable Travel Choices, encouraging walking and cycling, the location of high trip generating development to be in areas of good public transport accessibility and to ensure that development does not have a severe impact on the operation of the road network.
- Policy LP 45 concerns Parking Standards and Servicing, and requires that developments must provide for the accommodation of vehicles in order to provide for the needs of the development. Proposals must also seek to minimise the impact of car-based travel including on the operation of the road network and local environment.

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The Supplementary Planning Guidance documents below supplement adopted policies in the Development Plan:

*Delivering SuDS in Richmond (2016) Planning Guidance Document*

This document provides information on SuDS techniques which are expected to be adopted in new schemes.

*Refuse and Recycling Storage Requirements SPD (2015)*

Guidance with regard the integration and design of refuse collection, storage and management is provided in an additional document, adopted April 2015. This outlines the sizing and quantity requirements for refuse and recycling.

For flats providing communal waste containers, there should be provision of 70 litres per bedroom. The table contained on page 4 of the SPG omits to advise on capacity of dry recycling provision for a proposal of 6 units, however the document goes on to advise that the in mixed use developments commercial and domestic waste should be stored and collected separately.

*Affordable Housing SPD (2014)*

The SPD provides detailed advice for applicants, agents or developers undertaking residential development schemes, and sets out guidance on the requirements to contribute towards affordable housing. The requirement to provide affordable housing has to be addressed in all new housing developments, including changes of use, where planning permission is required.

In relation to smaller schemes, below the threshold of ten or more units, a financial contribution to the Affordable Housing Fund will be sought on sites involving new housing. For a proposal of 6 new units in replacement of employment floor space, a 60% Affordable Housing contribution is sought. In seeking this contribution, the Council will take account of Viability issues.

*Residential Development Standards SPD (2010)*

This SPD provides guidance and design standards to promote high quality sustainable design for residential uses. The document recognises that conversions can make more effective use of urban land for modern living needs.

*Small and Medium Housing Sites SPD (2006)*

This SPD gives guidance from the Council on the development and consideration of small and medium housing sites in the borough. It concerns residential development only and applies to small and medium housing sites such as the application proposal. The document provides design advice for the majority of residential developments which are likely to be proposed in the borough.

## Assessment

The key matters relating to the proposed change of use and development that are raised by the preceding review of the development plan and material considerations relates primarily to the following:

1. The requirement for new housing in the borough, and the impact on available office accommodation;
2. Detailed compliance with development control policies and associated material considerations.

We consider each in turn below:

*1, The requirement for new housing in the borough, and the impact on available office accommodation;*

As with other Councils in the country, Richmond Council is required to boost significantly the supply of housing in their local areas. NPPF requires Council to identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5%. This is needed in order to address short term requirements and to ensure a robust future supply, enabling choice and competition in the market for land. The latest London Borough of Richmond upon Thames Strategic Housing Market Assessment (December 2016) confirms that the local needs are not being met by development at present.

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The London Plan provides that Richmond Borough identify a minimum 10-year target for 3,150 homes between 2015-25. Councils are of course expected to deliver above this target, and take account of location and context, public transport accessibility and design standards.

There is a clear need to identify and deliver new housing within the borough.

The scheme would involve the loss of office space. Local Plan Policy LP 41 part A contains a presumption against the loss of any office floorspace in any part of the borough. The policy provides for a series of tests where such loss is proposed.

The first test (1) is to ensure that robust and compelling evidence is provided that demonstrates that there is no longer demand for an office based use in this location and that there is not likely to be in the foreseeable future. The marketing Report provided by HOUSTON LAWRENCE demonstrates that the office accommodation in this building has been marketed for well in excess of 2 years, with no realistic prospect of accommodation being achieved. This marketing exercise clearly demonstrates that the terms offered have been flexible, and the asking prices/rents are consistent with the local market. Despite this, the office accommodation on site has only been partially occupied by my client because a commercial letting of the accommodation could not be achieved.

The second part of the policy (2) requires that a sequential approach to the consideration of alternative schemes has been adopted. The main aim here is to ensure that employment generating and community uses are fully explored prior to a residential scheme being pursued.

The first step in the approach requires investigation of alternative employment uses including social or community infrastructure. The part of the building to which the application relates has been designed, constructed and marketed as a B1 (business) unit, the nature of the surrounding area and the other uses within the building dictate that it would not be possible to house a B2 (General Industrial) or B8 (Storage and Distribution) use within the unit without significant detrimental effects on neighbouring residential uses. The effects of the likely noise, fumes and vehicular movements associated within these uses could not be accommodated within the building without harm to surrounding residents (particularly those within the building).

In addition the potential for a co-working/serviced office have been fully investigated, and whilst this sector has seen growth during the marketing period, the lack of transport, the character of the area and the restricted size of the available space led to no enquires being made from these users.

Nevertheless a comprehensive marketing exercise including other uses has been undertaken.

Those town centre uses such as bars, restaurants and cafes all generate employment and contribute to the evening economy, and their location is guided by adopted policy LP25 to identified centres in the borough. The focus on existing centres is primarily in order that these uses can support traditional retail destinations with additional footfall and use of public transport provision, as well as enhancing them as destinations for commercial activity. Consequently, it would be inappropriate to develop such uses in this primarily residential location.

Similarly, institutional uses such as health clinics, nurseries, crèches, and leisure facilities are also generally guided to town centre locations where the effects of noise, parking and activity can be better assimilated, as well as providing support to existing public transport facilities. The marketing exercise has also confirmed that no enquiries were received in relation to these type of uses, suggesting that there is no significant demand for them in the area.

The second step in the sequential test set out in LP41 requires that a mixed use development is considered which seeks to maintain or improve the amount of employment floorspace on the site. The marketing exercise that has been undertaken offered full flexibility for a variety of options in reconfiguring the floor space. Suites have been marketed on the basis of units between 600 and 5,000 sqft could be accommodated, and whilst primarily offered as office space other uses would be acceptable subject to receipt of planning approval. Whilst this resulted in approximately 39 enquiries and 2 viewings. No offer of any kind have been received. It is clear that the option of a mixed use of the vacant accommodation has been fully investigated in compliance with the requirements of Appendix 5 of the Local Plan.

Lastly, the sequence provides for the Council exceptionally agreeing to residential development with the maximum provision of affordable housing. The policy test of whether the maximum affordable housing provision has been made is to be determined against policy LP36. The approach to policy LP36 is set out below, which concludes that the maximum financial contribution to affordable housing is offered.

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Continued

It is clear that the current COVID 19 pandemic has had and will continue to have a significant negative effect on the all aspects of commercial property. The effect on the application site is that it is now even less attractive as B1 offices use than it was prior to March 2020.

On the basis of the above, the tests within policy LP41 have been met and the principle of residential use of the application site is acceptable.

## 2. Detailed compliance with development control policies and associated material considerations.

Policy LP 1 of the Richmond Local Plan relates to design quality and requires development to be of a high architectural and urban design standard. Clearly, the existing building was designed as a mixed use residential and office building. The area of the building to which the change of use will apply was intended as a purpose built office. Helpfully the design of the building allows for the adoption of the design approach previously taken with the residential accommodation, and a seamless application of amenity space, fenestration and external features can be provided to ensure a cohesive overall design. The detailing of the proposed conversion has been carefully considered in order to contribute to the character and appearance of the area.

The proposal provides a mix of accommodation as follows:

- 4 no. 2 bedroom units
- 2no. 1 bedroom units

The layout of the floorplate and single storey nature of the office accommodation means that the provision of larger 'family' accommodation is not feasible, whilst ensuring the efficient use of this brownfield site.

The application scheme has been designed to satisfy or exceed the minimum requirements defined by the Nationally Described Space Standards, as well as those set out with the Council SPD on the subject. In addition, the accommodation has been designed to exceed Building Regulations Part M2/3 (Accessibility), with large, adaptable and flexible layouts capable of accommodating a wider range of possible needs.

The need to ensure that the maximum viable affordable housing provision is provided in all residential schemes has been the subject of detailed work by both the council and the application design team.

The policy provides at section B, (c) that sites below a threshold of 10 units are not required to make 'on site' contributions to affordable housing, but should make a financial contribution to the Affordable Housing Fund, which is commensurate with the scale of the development. In this case the policy seeks a 60% contribution for schemes of 6 units where they are proposed to replace employment floorspace. In accord with this the council will seek to the maximum reasonable amount of affordable housing having regard to economic viability; individual site costs; the availability of public subsidy; and the overall mix of uses and other planning benefits.

A Viability Assessment has been prepared and submitted in support of the application. The document takes account of a wide variety of parameters such as site/development costs, sales values, remediation, professional fees and developer profit. The Viability Assessment provides a comprehensive review of the financial viability of the scheme, the need to ensure an adequate level of developer profit whilst also making appropriate contributions to the level of affordable housing in the borough.

The assessment concludes that the appraisal contained within the document drives a Residual Land Value of £831,000 (rounded). As this is £131,000 above Benchmark Land Value of £700,000, it indicates that the proposed scheme can sustain a maximum financial contribution towards affordable housing of £131,000.

In reaching this conclusion, the team have been cognisant of the recent determination of proposals at Schurlock Place, – 23 Third Cross Road, Twickenham (Application Ref: 19/2860/FUL). In that case the Officer considers the issue of affordable housing at paras 12.1-to 12.4, and concludes that:

*“12.3 .....On that basis it is advised that there should be no requirement for a full reappraisal of the scheme. A nil contribution is therefore in accordance with Policy LP36. (This approach is considered in accordance with the principles in the NPPF, looking at whether circumstances have changed since an earlier assessment, and taking a proportionate approach to whether new evidence is required.)”*

The approach adopted by the officer demonstrates a pragmatic application of the policy in light of up to date and accurate viability information. The same approach has been adopted in the preparation of the current application.

*Continued*

The acceptability of residential use in this area has been established through the flats found on the other floors of this building, they have been found to be compatible with the predominant character of the surrounding area. Residents already within the application property already enjoy good levels of amenity, and there are no known significant conflicts between land uses in the surrounding area.

A review of the detailed plans accompanying the application make it clear that the proposal will not have a significantly negative impact on the surrounding residential amenity in terms of overlooking/privacy, outlook, rights to light, noise and disturbance.

In accordance with Local Plan Policies LP44 and LP45 and Richmond Parking Standards SPD, the development will provide an appropriate level of cycle and car parking. The existing access, car parking provision and arrangements will be adopted unchanged, providing the proposal with 6 no. reallocated spaces. This directly accords with the provision required within the standards included with Appendix 3 of the Local Plan.

The development is provided with secure basement cycle storage for 34 cycles in the main store and 5 cycles in the secondary store, together with provision for 6 visitor cycle parking spaces at surface level. This again accords with Local Plan policy.

The arrangement for refuse and mixed recycling bins is shown on the accompanying architectural drawings (FORM plan ref 859-02-022) and provides sufficient capacity to accommodate the proposal alongside the existing uses within the building. Whilst the office refuse storage and proposed residential waste store share the same area of the building, this is an efficient and appropriate response to the beneficial reuse of the building. Individual bins will be clearly marked in order that residents and commercial occupiers do not contaminate waste streams and contractors managing the collection of waste can do so effectively.

**Conclusion**

The application proposals described above represent a proportionate and sustainable response to the long term vacancy of the office accommodation originally constructed on the site. The proposal has been demonstrated to meet all relevant planning policies and guidance, and provides for an efficient reuse of this underused property to meet the residential accommodation needs of the area.

The proposals are commended to the Council and planning permission is sought to be granted without delay.



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## Design Proposals

The application seeks to convert the unlet commercial space on the western half of the first floor of the building into 6 residential units. Refer to the First floor Mixed Use layout appended for the existing condition and the Proposed First Floor Layout appended for the proposed condition.

This would provide a further 4 no. 2 bedroom units and 2 no. 1 bedroom units, as shown on Fig. 10 below.

The conversion would be technically straightforward as rising services and drainage serving the floors above already have to pass through the ground floor commercial space, and the perimeter walls, windows and balconies were consistent on both first and second floors of the building in the original scheme, so no alterations are proposed to the already approved external elevations.

The same amenity provisions of projecting balconies are retained as on the second floor above. Already approved provisions for outlook, daylight and sunlight would apply as in both the consented schemes.

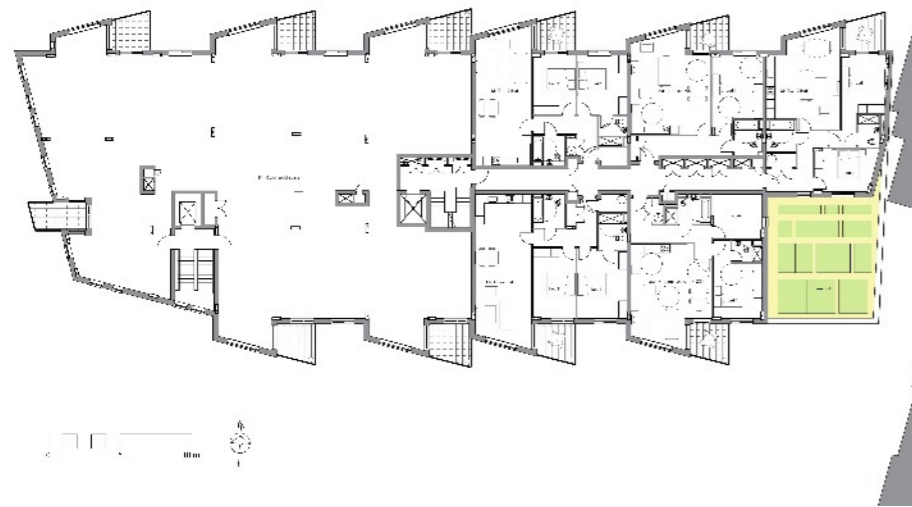


Fig. 9 - Reduced plan of mixed use first floor.

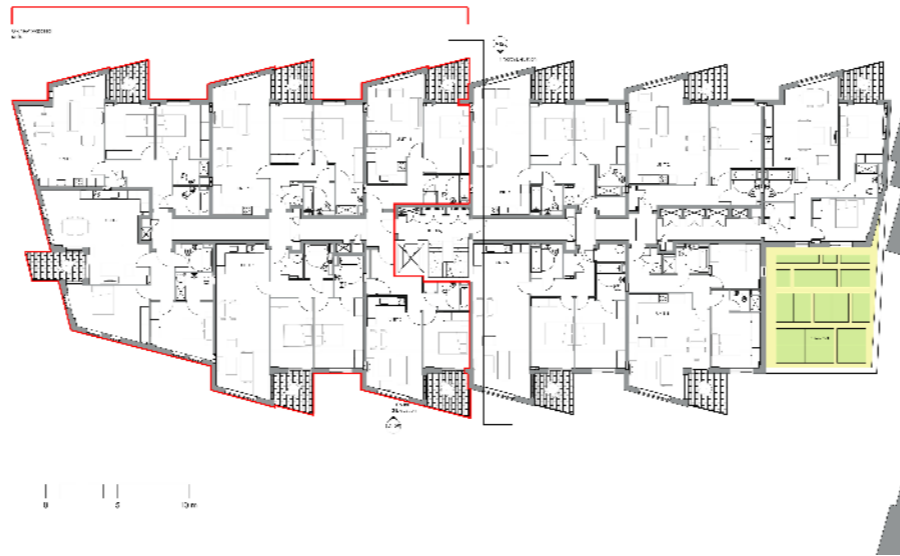


Fig. 10 - Reduced plan of residential first floor as proposed.



Fig. 11 - Coloured expanded aerial view of the flat layout.

## Commercial Unit Marketing

During the construction of the development the commercial space was marketed by Pittville Developments Ltd and from March 2018 by Houston Lawrence.

Despite being offered in a variety of unit sizes ranging from 624 sq.ft. to 5,863 sq.ft, and for a variety of tenant types, it has not proved possible to let.

Houston Lawrence have provided a comprehensive Marketing Report dated June 2020 which is included with the application.

## Transport assessment, parking & cycles

A Transport Assessment was carried out by Cottee Highway and Transportation Consultants [ref. DH/1240] and submitted with the original Planning applications.

This led to provision of a total of 38 no. parking spaces including 5 no. disabled parking bays in the mixed use scheme as built. 31 of the spaces are located in the basement car park. For the mixed use version 24 parking bays are intended for the private apartments and 14 spaces for the commercial space use.

For the fully residential consented scheme, which included ground floor live-work units, the Transport Assessment advised that 35 car parking spaces should be provided, including 4 disabled parking spaces. The actual provision on site can exceed that target.

The proposed change of use of the first floor commercial space will reduce the need for commercial user parking and allow reallocation of 6 no. spaces to the new residential units.

The development is provided with secure basement cycle storage for 34 cycles in the main store and 5 cycles in the secondary store, together with provision for 6 visitor cycle parking spaces at surface level.

## Accessibility / Lifetime Homes

The approach to the building is paved and set to provide level access from the pavement on Railshead Road. The entrance lobby to the residential common parts is set level with the external paving and leads to a lift serving all levels of the building. Upper floor common parts are designed to accommodate wheelchair access.

The apartments have all been designed to Lifetime Homes standards and will accommodate visiting wheelchair users. Four wheelchair adaptable units have also already been provided within the eastern half of the building.



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## Waste and Recycling

A waste and recycling strategy were devised for the consented scheme as built and the arrangements for ground floor bin stores approved by Richmond under reference 13/3388/DD03 on 26th January 2016.

The provision required was for a single waste bin store only. The proposed waste bin store (as shown in Drg. 859-02-22A) can take 9 bins, serving both residential and commercial.

Although theoretically the commercial requirement would be lowered no change to the commercial provision is proposed.

Collection arrangements are unchanged.

## Flood Risk

A Flood Risk Assessment [HLEF25703-001R], Sequential Risk Test [HLEF25703/004R] and Addendum were prepared by RPS Group for the original Planning applications 13/3388/FUL and 13/3390/FUL and agreed with Richmond Council.

The measures advised were put in place including provision for increasing the height of the river wall bounding the River Crane, all carried out in liaison with the Environment Agency.

One of the measures proposed was that all residential space should be located at a higher level than the maximum breach flood level, but that this requirement did not apply to commercial space. As a result the residential accommodation was all located at first floor level and above in the building and this arrangement would not be changed in the now proposed change of use.



Fig. 12 - Level access approach to the building from Railshead Road.

## In Conclusion

1 Railshead Road has been a successful development in all respects except in relation to the letting of the commercial space. A protracted marketing campaign by Houston Lawrence has failed to find tenants attracted to the space.

On the other hand the London Borough of Richmond upon Thames has a requirement for additional housing and there does seem to be local demand around Railshead Road.

The building lends itself to straightforward conversion of the underutilised space to residential use, with no detriment to the amenity of existing or new residents or to surrounding property.

The sequential approach to considering change of use set out in Policy LP41 has been applied and concludes that residential use is appropriate.

A Viability assessment has been carried out by James R. Brown which concluded that there is enough value in the residential scheme to support a maximum reasonable financial contribution towards affordable housing of £131,000.

Finally, all aspects of the proposals have been separately considered by Michael Paget of Cornerstone Barristers who has provided an opinion appended to this application.

We hope that in the light of the above this application will be found acceptable to the Council.

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