

9-10 George Street,  
Richmond, London,  
TW9 1JY

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## PLANNING STATEMENT

PREPARED BY PEGASUS GROUP | CARLFORD PROPERTIES LTD | DECEMBER 2020 | P20-2840

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# PLANNING STATEMENT

**9-10 GEORGE STREET, RICHMOND, LONDON  
TW9 1JY**

**ON BEHALF OF CARLFORD PROPERTIES LTD.**

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)  
PLANNING AND COMPULSORY PURCHASE ACT 2004**

**PEGASUS REF: P20-2840**

**DATE: DECEMBER 2020**

## Pegasus Group

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## CONTENTS:

Page No:

1.	INTRODUCTION	1
2.	SITE DESCRIPTION	2
3.	BACKGROUND AND PLANNING HISTORY	3
4.	DEVELOPMENT PROPOSAL	4
5.	PLANING POLICY CONTEXT	7
6.	PLANNING CONSIDERATIONS	15
7.	CONCLUSION	24

## 1. INTRODUCTION

1.1 This Statement has been prepared by Pegasus Group on behalf of Carlford Properties Ltd. ('the Applicant'), in support of a full planning application for the following proposed development at 9-10 George Street, Richmond, London, TW9 1JY ('the site'):

***"Retention of part Ground Floor within Use Class E with change of Use of part ground floor and first floor from Use Class E to Use Class C3 residential and upward extension to provide a total of 6no. self-contained residential units. Replacement of existing shopfront and installation of windows to No. 9 George Street."***

1.2 This Statement sets out the planning rationale that underpins the proposed development, to demonstrate its acceptability in planning terms.

1.3 The Statement is structured as follows:

- **Section 2** provides a description of the site and the surrounding area;
- **Section 3** gives an overview of the relevant planning history;
- **Section 4** provides a description of the development proposals;
- **Section 5** sets out the planning policy context;
- **Section 6** assesses the proposals against the relevant planning considerations; and
- **Section 7** summarises and concludes the report.

## 2. SITE DESCRIPTION

- 2.1 The application site, 9-10 George Street, is centrally located within Richmond, occupying a prominent high street location which is characterised by its retail offering. This is reflected in the site's designation within the Key Retail Frontage.
- 2.2 There are no listed structures within the curtilage of the site and there are no listed buildings within the immediate vicinity of the site. There are several listed buildings within the wider area however, namely a row of Grade II buildings at the end of George Street, along King Street. Additionally, the site lies within the Richmond Central Conservation Area.
- 2.3 The building itself stands at 2-storeys across both 9 and 10 George Street. The ground floor comprises a shopfront which spans both elements while the upper floors have distinct architectural styles. The upper floors of No.10 George Street comprise a white rendered front elevation and a pitched roof. No.9 meanwhile comprises a stock-brick elevation with a front pitch roof disguised behind a parapet and flat roof to the rear.
- 2.4 As described in the Planning History section below, the building has lawful use within Class E at ground floor level, being most recently used as an electronic gadgets / vape / phone store. The upper floors have lawful ancillary use to the ground floor unit.
- 2.5 With regard to the surrounding area, the ground floor level of George Street primarily comprises retail use and other uses associated with primary retail frontage such as banks, cafes and restaurants. Upper floors in within the area are mixed, comprising offices, ancillary retail, and residential.
- 2.6 In terms of accessibility, the site is assessed as 'PTAL 6a' and is therefore considered to have "excellent" access to public transport. George Street is served by several bus routes, and Richmond Station is located approximately 440m to the north, which is served by the London Underground (District line), London Overground, and South Western Railway services.
- 2.7 The site is within Flood Zone 1 and is therefore assessed as being at the lowest risk of flooding with a less than 1 in 1000 year chance.

### 3. PLANNING HISTORY

3.1 A comprehensive search of LB Richmond's planning databases shows that there are limited planning records of relevance to this proposal, with applications mainly seeking advertisement in relation to the ground floor retail unit and changing occupiers over the years.

- **Ref. 18/0322/FUL** – Change of Use from Class A1 to flexible use within Class A1 and / or Class A3. *Approved 27<sup>th</sup> April 2018*
- **96/0564/FUL** – New Shopfront. *Approved 17<sup>th</sup> May 1996*

3.2 Permission 18/0322/FUL allows the flexible lawful use of the property within Class A1, Class A3 or Class A1/A3 mixed use, with the permission expiring on 27<sup>th</sup> April 2021. Since the grant of this permission, the premises has only been used as a retail shop (formerly Class A1), which was the lawful use of the building prior to the submission of application 18/0322/FUL. Therefore, we are of the view that permission 18/0322/FUL has not been implemented, which is substantiated by no planning conditions associated with this permission being discharged. Accordingly, it is our view that Condition U42090 "Use Class Restriction" attached to permission 18/0322/FUL is not of relevance, with the lawful use of the property being Class E (Commercial, Business and Service) following the introduction of The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.

#### 4. DEVELOPMENT PROPOSAL

4.1 This full planning application seeks permission for the following proposed development:

***"Retention of part Ground Floor within Use Class E with change of Use of part ground floor and first floor from Use Class E to Use Class C3 residential and upward extension to provide a total of 6no. self-contained residential units. Replacement of existing shopfront and installation of windows to No. 9 George Street."***

4.2 In summary, this application seeks to retain retail / commercial use at ground floor, whilst providing 6no. self-contained residential units on the upper floors, through conversion of the existing floorspace and new build extension.

4.3 An accommodation schedule of the existing and proposed floorspace is provided below at Table 1:

**Table 1 – Existing and Proposed Gross Internal Areas**

Use Class	Existing GIA	Proposed GIA	Net loss/gain
Ground Floor			
E	305.8sqm	243sqm	-62.8sqm
C3 (Access/Bike Storage)	-	62.8sqm	62.8sqm
First Floor			
E	285.1sqm	-	-285.1sqm
C3	-	285.1sqm	285.1sqm
Second Floor			
C3	-	62.9sqm	62.9sqm
Third Floor			
C3	-	60.1sqm	60.1sqm
<b>Totals</b>			
<b>E</b>	<b>590.9sqm</b>	<b>243sqm</b>	<b>-347.9sqm</b>
<b>C3</b>	<b>-</b>	<b>470.9sqm</b>	<b>470.9sqm</b>

#### **Land Use**

4.4 As detailed within the Planning History Section, following the introduction of The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020, we consider the lawful use of the property being Class E (Commercial, Business and Service). It is proposed that the ground floor is to be retained within Class E use, with the first floor to be converted to form 4no. self-contained

flats (Class C3) and the new build extension of the second/third floor to provide a further 2no. self-contained flats (Class C3).

### **Appearance**

- 4.5 The upward extension will principally be located above No.9 and will comprise a mansard which is set back from the existing structure to minimise impact upon the streetscene and ensure there is no negative impact upon the character of the Conservation Area. A modest extension will also be installed to the existing roof of No.10 to the rear of the building, in order to allow habitable accommodation at second floor level.
- 4.6 The extension has been carefully designed to ensure minimal impact upon the Conservation Area and streetscene. Namely, an extended parapet to No. 9 will be installed to largely disguise the new mansard from street level.
- 4.7 The proposed development has also been carefully designed to ensure that prospective occupiers will enjoy a good level of amenity. Namely, lightwells have been introduced at first floor level to provide courtyard space, allowing light and outdoor amenity space to the residential flats located at first floor level.
- 4.8 In addition, this application seeks to regularise the front elevation of No. 9, through removal of an existing window at second floor level and replacement with two new windows of equal proportions to the existing first floor windows. This will be a positive amendment to the appearance of the building and regularise the currently disproportioned front elevation.
- 4.9 Part of the ground floor will be given to the access and bicycle storage serving the residential units, with a replacement shopfront to be installed. As part of this, it is proposed to bring the shopfront flush with the pavement to modernise the retail/commercial unit and attract tenants into the unit, thus contributing to the viability and vitality of the High Street. Whilst modern in appearance, the shopfront alterations will utilise traditional features (such as stallriser and mullions) and materials.

### **Layout**

- 4.10 The dwellings will be accessed from a separate entrance to that of the retail unit as detailed on the submitted proposed ground floor plan. In addition, at ground level there will be dedicated secure cycle storage for use by residents.



- 4.11 The first floor is to be converted to form 4no. self-contained flats, comprising 3x1-bed and 1x2-bed. The 2-bed flat will be duplex in that a study/lounge and courtyard are located at second floor level within the roof extension to No. 10 George Street. The new built extension to No. 9 will comprise of a 1-bed unit at second floor level, and a 1-bed unit at third floor level, each of which will be served by a balcony.
- 4.12 Each of the proposed dwellings has been designed to ensure accordance with the Nationally Described Space Standards
- 4.13 In terms of the outlook, and daylight/sunlight to the proposed units, the scheme has been carefully designed within the inherent constraints present in such a complex scheme. Lightwells and courtyards will be introduced into the existing first floor levels of 9-10 George Street to allow the future occupiers a good standard of amenity.
- 4.14 A Daylight Sunlight Study has been carried out and submitted in support of this application. This will be considered later, within the assessment of this Planning Statement.

#### **Access and Parking**

- 4.15 As described herein, primary access to the proposed residential units will be gained from No. 9 George Street from an access door which will be incorporated into the new shopfront. Within the entrance lobby at ground floor level will be a secure cycle storage.
- 4.16 Separate access to the Class E floorspace is achieved from No. 10 George Street, with the development also served by secondary access to the rear (as per existing arrangement).
- 4.17 Given the sustainable location of the site, within immediately proximity to shops, services and public transport, the proposed dwellings will be 'car free'. Cycle parking is located to the ground floor, within the proposed entrance lobby. This will comprise a minimum of 10 long stay parking space, and 2 short stay spaces.

## 5. PLANING POLICY CONTEXT

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) states that planning applications for development should be determined in accordance with the Statutory Development Plan unless *material considerations* indicate otherwise.
- 5.2 The Development Plan for London Borough of Richmond Upon Thames consists of the London Plan (adopted March 2016) and the Local Plan (adopted July 2018 and 3<sup>rd</sup> March 2020 in relation to two legal challenges).
- 5.3 London Borough of Richmond are also in the process of preparing a new Local Plan which will be used to guide the location, amount, and type of development the Borough needs to accommodate. The Council have carried out a 'Call for Sites' exercise to date.
- 5.4 The Council's latest Local Development Scheme (published July 2019) stages that adopted of the Local Plan is scheduled for 2024. Owing to the early stage of preparation, this document will carry no weight in decision-taking at the present time.
- 5.5 Other material considerations that are relevant to the application proposals include the following:
- National Planning Policy Framework (NPPF) (published in February 2019);
  - National Planning Policy Guidance (NPPG);
  - Adopted London Borough of Richmond and Mayoral Supplementary Planning Documents (SPDs) and Supplementary Planning Guidance (SPG);
  - Richmond Central Conservation Area Study; and
  - Draft London Plan (intent to adopt published December 2019).

### **National Planning Policy Framework (2019)**

- 5.6 The National Planning Policy Framework (NPPF) was published by the Government in February 2019. Chapter 2 states that "*the purpose of planning is to contribute to the achievements of sustainable development*". Further, this chapter notes that "*sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs*".

5.7 The NPPF stipulates that the planning system has three overarching objectives in order to achieve sustainable development, which are an economic, social, and an environmental objective, each of which are interdependent. It also states that at the heart of the Framework is the "*presumption in favour of sustainable development*".

5.8 **Paragraph 68** states that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly.

5.9 **Paragraph 117-118** states that planning decisions should promote and support development of under-utilised land and buildings, including development of car parks, especially if this would help to meet identified needs for housing.

#### **London Plan (March 2016)**

5.10 The London Plan is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years.

5.11 Table 3.1 sets out the average housing supply monitoring targets between 2015-2025. For Richmond, the minimum ten year target is 3,150 dwellings which represents an annual target of 315 dwellings.

5.12 **Policy 3.3 (Increasing Housing Supply)** states that Boroughs should seek to achieve and exceed the relevant minimum borough annual average housing target in Table 3.1.

5.13 **Policy 3.5 (Quality and Design of Housing Developments)** states that the design of all new housing developments should enhance the quality of local places, taking into account physical context, local character, density, tenure and land use mix.

5.14 Table 3.3 sets out the minimum space standards for new dwellings. The standards for 2 storey dwellings are set out in the table below:

Number of Bedrooms	Number of Bed Spaces	Minimum GIA (square metres)
1 bed (one storey)	2 persons	50 sqm
1 bed (two storey)	2 persons	58sqm
2 bed (one storey)	3 persons	61 sqm

### **Adopted Development Plan**

5.15 **Policy LP1 (Local Character and Design Quality)** states the Council will require all development to be a high architectural and urban design quality. To ensure development respects, contributes to and enhances the local environment and character, the following will be considered when assessing proposals:

- Compatibility with local character including the relationship to existing townscape, development patterns, views, local grain and frontages as well as scale, height, massing, density, landscaping, proportions, form, materials and detailing;
- Layout, siting and access, including making best use of land;
- Space between buildings, relationship of heights to widths; and
- Suitability and compatibility of uses.

5.16 Specifically, with regards shopfronts, this policy seeks to resist the removal of shopfronts of architectural or historic interest. Any alterations to shopfronts, including related signage and illumination, should complement the proportions, character, materials and detailing of the wider building as well as the overarching character of the area.

5.17 Given the location of the site within the Richmond Central Conservation Area, any shopfront alterations will have to pay special regard to heritage and the impact upon this Conservation Area. The 'Shopfronts' SPD (2010) also contains prescriptive design guidance with regards shopfront alterations within the borough which development must accord with.

5.18 **Policy LP2 (Heights)** states that the Council will require buildings to make a positive contribution towards the local character, generally reflecting the prevailing building heights within the vicinity, and respecting the local context

through appropriate scale, height, mass, urban pattern, development grain, materials, streetscape, roofscape, and wider townscape and landscape.

- 5.19 **Policy LP3 (Designated Heritage Asset)** states that the Council will require development to conserve and, where possible, take opportunities to make a positive contribution to, the historic environment of the borough. Development proposals likely to adversely affect the significance of heritage assets will be assessed against the requirement to seek to avoid harm and the justification for the proposal. The significance (including the settings) of the borough's designated heritage assets, encompassing Conservation Areas, listed buildings, Scheduled Monuments as well as the Registered Historic Parks and Gardens, will be conserved and enhanced

The Council will resist substantial demolition in Conservation Areas and any changes that could harm heritage assets, unless it can be demonstrated that:

1. In the case of substantial harm or loss to the significance of the heritage asset, it is necessary to achieve substantial public benefits that outweigh that harm or loss;
2. In the case of less than substantial harm to the significance of the heritage asset, that the public benefits, including securing the optimum viable use, outweigh that harm; or
3. The building or part of the building or structure makes no positive contribution to the character or distinctiveness of the area.

All proposals in Conservation Areas are required to preserve and, where possible, enhance the character or the appearance of the Conservation Area.

- 5.20 **Policy LP8 (Amenity and Living Conditions)** states that all development will be required to protect the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties. The Council will:

- Ensure the design and layout of buildings enables good standards of daylight and sunlight to be achieved in new development and in existing properties affected by new development; where existing daylight and sunlight conditions are already substandard, they should be improved where possible;
- Ensure that proposals are not visually intrusive or have an overbearing impact as a result of their height, massing or siting, including through creating a sense of enclosure; and

- Ensure there is no harm to the reasonable enjoyment of the use of buildings, gardens and other spaces due to increases in traffic, servicing, parking, noise, light, disturbance, air pollution, odours or vibration or local micro-climatic effects.

5.21 In terms of the quantum of outdoor amenity space, Policy LP8 requires that developments accord with the relevant SPD: Residential Development Standards. This SPD sets out that 'sufficient outdoor amenity space must be provided in new residential developments' which is quantified as a minimum of 5 sqm of private outdoor space for 1-2 person dwellings plus an extra 1 sqm should be provided for each additional occupant.

5.22 **Policy LP22 (Sustainable Design and Construction)** states that development of 1 dwelling unit or more will be required to complete the Sustainable Construction Checklist which has to be submitted as part of a planning application. Development that results in a new residential dwelling, will be required to incorporate water conservation measures to achieve maximum water consumption of 110 litres per person per day for homes (including an allowance of 5 litres or less per person per day for external water consumption. For carbon dioxide emissions, new residential development (of 10 units or less) should achieve a 35% reduction.

5.23 **Policy LP26 (Retail Frontages)** seeks to resist the loss of retail floorspace within Key Shopping Frontage. Other uses converting to retail will be supported, subject to there being no adverse impact on the centre.

5.24 **Policy LP34 (Housing)** states that the Borough's target is 3,150 new dwellings between 2015-2025. The St Margaret's area is required to provide between 1,000 and 1,050 new dwellings within this period, along with Twickenham Riverside, North Twickenham, South Twickenham and West Twickenham.

5.25 **Policy LP34 (Housing Mix and Standards)** reiterates the London Plan requirement that all new residential dwellings must accord with the Nationally Described Space Standards. In addition, this policy requires that all new housing provides adequate amenity space, encouraging that this is provided by way of purpose built, well designed and positioned balconies or terraces where new residential units are on upper floors.

Amenity space for all new dwellings should be:

- private, usable, functional and safe;

- easily accessible from living areas;
- orientated to take account of need for sunlight and shading;
- of a sufficient size to meet the needs of the likely number of occupiers;  
and
- accommodation likely to be occupied by families with young children  
should have direct and easy access to adequate private amenity space.

5.26 **Policy LP36 (Affordable Housing)** sets out that for residential developments providing less than 10 units, on land where there is no loss of employment floorspace, a financial contribution will be sought. The affordable housing contribution is based upon the sales value of the properties. The table within the Policy states that the contribution that is likely to be sought would be discounted to represent 20% affordable housing.

5.27 **Policy LP45 (Parking Standards and Servicing)** states that the Council will require new development to make provision for the accommodation of vehicles in to provide for the needs of the development while minimising the impact of car based travel including on the operation of the road network and local environment, and ensuring making the best use of land.

Appendix 3 of the adopted Local Plan sets out the maximum parking standards and states that for sites within PTAL 0-3 (such as the pre-application site), 2no. car parking spaces should be provided for 3+ bed dwellings.

#### **Emerging London Plan (Intend to Publish December 2019)**

5.28 The emerging London Plan provides updated policies to the London Plan (March 2016) which sets the overall strategic plan for London.

5.29 **Draft Policy GG2 (Making the Best Use of Land)** states that to create successful sustainable mixed-use places that make the best use of land, those involved in planning and development must, inter alia:

- Enable the development of brownfield land, particularly in Opportunity Areas, on surplus public sector land, and sites within and on the edge of town centres, as well as utilising small sites;
- Prioritise sites which are well-connected by existing or planned public transport; and

- Applying a design-led approach to determine the optimum development capacity of sites.
- 5.30 **Draft Policy H1 (Increasing Housing Supply)** states that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites, especially sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station or town centre boundary.
- 5.31 **Draft Policy H2 (Small Sites)** states that Boroughs should pro-actively support well-designed new homes on small sites (below 0.25 hectares in size) through both planning decisions and plan-making in order to,
- 1) *Significantly increase the contribution of small sites to meeting London's housing needs;*
  - 2) *Diversify the sources, locations, type and mix of housing supply;*
  - 3) *Support small and medium-sized housebuilder;*
  - 4) *Support those wishing to bring forward custom, self-build and community-led housing; and*
  - 5) *Achieve the minimum targets for small sites set out in Table 4.2 as a component of the overall housing targets set out in Table 4.1.*
- 5.32 Table 4.1 sets out the updated 10 year targets for net housing completions (2019/20 – 2018/29). For LBR, the 10 year housing target is 4,110 dwellings.
- 5.33 Table 4.2 sets out the 10 year targets (2019/20 – 2028/29) for net housing completions on small sites (below 0.25 hectares in size). For LBR, the 10 year housing target is 2,340 dwellings.
- 5.34 **Draft Policy D6 (Housing Quality and Standards)** states that housing development should be of high quality and design and provide adequately sized rooms. For private internal spaces, a dwelling with two or more bedspaces must have at least one double (or twin) bedroom that is at least 2.75m wide. Every other additional double (or twin) bedroom must be at least 2.55m wide. Where there are no higher local standards in the borough Development Plan Documents, a minimum of 5 sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sqm should be provided for each additional occupant, and it must achieve a minimum depth and width of 1.5m.



5.35 Consideration of the Development Plan policies, assessed against the application proposals, is provided within the following section.

## 6. PLANNING CONSIDERATIONS

6.1 This section analyses the suitability of the proposed development in the context of local and national planning policy. Starting with the principle of development, this section demonstrates that the proposed development represents sustainable development which is fully in accordance with the Development Plan and that there are no other *material considerations* which outweigh the benefits of the scheme.

### **Principle of Development**

#### *i. Loss of Existing Use*

6.2 No. 9 / 10 George Street has a lawful planning use within Class E, having been in most recent occupation as a retail shop at ground level within ancillary storage space at first floor level (totalling 590sqm).

6.3 This application seeks to convert the existing first floor (285.1sqm) to provide residential accommodation, as well as additional habitable accommodation provided through upward extensions (second and third floor). The proposed residential element will be accessed at ground level through No. 9, alongside the provision of a dedicated bike store (totalling 62.8sqm). Accordingly, the development proposal involves the loss of a total 347.9sqm Class E floorspace, the majority of which is at first floor level.

6.4 Local Plan Policy LP26 seeks to restrict the loss of existing retail floorspace within Key Shopping Frontages. The policy is not explicit as to whether this protection relates to ground floorspace only. Notwithstanding, it should be noted that Policy LP26 was drafted prior to the changes to the Use Class Order<sup>1</sup> and introduction of Class E, which the Government introduced to provide increased flexibility to operators and reduced involvement of the planning system.

6.5 The application proposals involve the nominal loss of ground floor space (62.8sqm) to facilitate residential access and bicycle storage. The loss of this amount of ground floor floorspace within the Key Shopping Frontage will have a *de minimis* impact upon the overall quantum of retail provision within Richmond Town Centre and is not considered to impact negatively upon its vitality and viability.

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<sup>1</sup> The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020

- 6.6 To the contrary, the proposed development retains a retail/commercial unit of 243sqm GIA, and as such the site will continue to contribute to the retail and commercial function of Richmond Town Centre. Further, the unit will be “fit out” to a high standard ensuring it meets the requirements of modern operators.
- 6.7 With regards to the first floor, this has historically been used as ancillary storage associated with the ground floor shop. Accordingly, the conversion of this space to residential will not result in any loss of retail “sales” floorspace. It would also be our view that the existing use of the first floor does not represent the most efficient use of land, with the residential use of upper floors encouraged by the NPPF (as described below).
- 6.8 It is also important to note that given the existing No. 9/10 is amalgamated into a single unit, the proposed development will not reduce the overall quantum of premises within George Street.
- 6.9 For the reasons set out above, it is our view the proposed change of use is consistent with national and local planning policy.

*ii. Principle of Residential*

- 6.10 The proposed change of use of the first floor to residential (Use Class C3) will make efficient and effective use of land in line with the aims of the NPPF. Namely, Paragraph 118 of the NPPF specifically encourages Local Planning Authorities to make decisions which promote the use of under-utilised buildings to provide residential uses, making specific reference to the conversion of floors above shops.
- 6.11 Within Richmond’s Local Plan, one of the Strategic Objectives (Meeting Local Peoples Needs (3)) seeks to ensure a suitable and high quality mix of housing stock, with higher density developments located within the borough’s centres and areas best served by public transport.
- 6.12 Policy LP34 (Housing) states that the Borough’s target is 3,150 new dwellings between 2015-2025. The Richmond area is required to provide between 1,000 and 1,050 new dwellings within this period. The Draft London Plan increases this target to 8,110 dwellings between 2019/20-2028/29 which represent a significant increase.

- 6.13 Draft Policy H2 (Small Sites) of the 'Intend to Publish' London Plan seeks to proactively support well-designed new homes on small sites (under 0.25 hectares) in order to significantly increase the contribution of small sites to London's housing targets. Table 4.2 sets out a 10-year target for net housing completions on small sites as 2,340 (annual requirement of 234 dwellings). The targets set out in the Policies are minimum targets, and therefore boroughs should seek to exceed these targets. The site provides an opportunity to contribute towards the Borough's target for bringing forward residential development on small sites.
- 6.14 The provision of housing in this location is therefore considered to accord with relevant national, regional and local policies. Specifically, the development proposal accords with Paragraph 118, part (d) of the NPPF which promotes the development of under-utilised sites especially if this would help to meet identified needs for housing and available sites could be used more effectively. In this context, Paragraph 118 (d) promotes the conversion of floors above shops to provide residential units.

### **Design and Siting**

- 6.15 Policy LP2 states that all new development must reflect the character of the surrounding area and protect the amenity and living conditions of neighbours. In addition, Paragraph 117 of the NPPF states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions, through making use as much as possible of previously developed land.
- 6.16 The design of the proposed development has been developed to be in keeping with the character and appearance of the area, with particular regard to the prevailing heights of buildings in the surrounding area, and in terms of the overarching character of the Conservation Area. In addition, the replacement of the fenestration to No. 9 seeks to improve the appearance of the building by regularising the overall proportions.
- 6.17 The proposal seeks to create an appearance of 'stepping up' towards 8 George Street so as to ensure consistency within the existing built form of the street.

- 6.18 The proposed upward extension to No. 9 George Street comprises a mansard which is set back behind a parapet to minimise visibility from street level. The palette of materials utilised in this proposed upward extension have been carefully chosen to reflect existing roofs in the area. With regards the mansard roof extension, which will be visible from street level, a traditional lead finish will be utilised, incorporating dormer windows.
- 6.19 The roof extension to No. 10 will be located to the rear of the existing sloped roof and, whilst not visible from George Street, has also been designed to comprise a traditional lead finish to protect the character of the Conservation Area.
- 6.20 In terms of the existing shopfront, this is not considered to make a positive impact to the Conservation Area. The proposed alterations therefore seek to modernise the shopfront, whilst ensuring a positive impact upon the setting of the Conservation Area. Since the retail unit has been vacant since at least April 2017 this will also serve to enhance the viability and vitality of an important shopping area by attracting tenants.
- 6.21 The new shopfront will respect the character of the Conservation Area by utilising traditional materials – namely timber – as well as retaining traditional features such as stallrisers, mullions and fascia.
- 6.22 The appearance and design of the proposed extensions and new shopfront is therefore considered to accord with the relevant national policies and Policy LP39 of the Local Plan.

### **Housing Standards**

- 6.23 The proposed development has been designed to provide a high-quality living standard and will comprise 6 no. dwellings, of which 5 will comprise 1 bed, 2 person dwellings, and 1 will comprise a 2 bed, 3 person dwelling.
- 6.24 Policy LP35 (Housing Mix and Standards) states that development should generally provide family-sized housing outside of town centres and Areas of Mixed Use, and that the housing mix should be appropriate to the location. As the proposed development is located within Richmond Town Centre, and is constrained by the conversion of an existing building, we consider the proposed 1-2 bed units provide an appropriate housing mix for the location.

- 6.25 In addition, Policy LP35 also requires all new residential development to comply with the Nationally Described Space Standards. All of the proposed dwellings exceed the internal space standards requirements.
- 6.26 The proposed development has been carefully designed to ensure that a high-quality living standard is provided in terms of space standards, amenity space and also daylight/sunlight.
- 6.27 The Daylight Sunlight Study (Within) submitted in support of this application confirms that the majority of habitable rooms within the proposed development will receive satisfactory levels of daylight and sunlight.
- 6.28 Owing to the inherent constraints present in such a location as the application site however, there are some shortfalls when assessed against BRE criteria. Namely, the bedroom to Flat 1.01 falls short of BRE standards in the Average Daylight Factor Results, and there are some shortfalls with regards the Daylight to Windows results, as can be seen at Appendix 3 of the Daylight Sunlight (Within) Report.
- 6.29 It should be noted however, that BRE's recommendations are not intended to be implemented in a ridged fashion and moreover a flexible approach should be taken. Given the constrained location of the site in an urban location, some shortfalls are to be expected.
- 6.30 In terms of outdoor amenity space, each flat will benefit from access either to an internal courtyard or in the case of Flat 3.01 a balcony will be provided. These outdoor areas have been designed to meet the relevant standards as set out within Richmond's Residential Development Standards SPD.
- 6.31 Further, in addition to the proposed outdoor amenity space proposed as part of each unit, as the site is located within Richmond's town centre, prospective occupiers of the units will benefit from access to all of the outdoor amenity space Richmond has to offer. Namely, Richmond Green – located a short way to the north of the site – and Richmond Park.
- 6.32 Policy LP35(E) states that 90% of new build housing is required to meet Building Regulation Requirement M4 (2) 'accessible and adaptable dwellings' and 10% of all new build housing is required to meet Building Regulation Requirement M4 (3) 'wheelchair user dwellings',

- 6.33 Given all units within the proposed development will be located above ground floor level, and the inherent constraints present at the site prevent the possibility of a lift being installed, it has not been possible to provide wheelchair user dwellings.
- 6.34 The proposed residential accommodation, including communal hallways and private access points has been designed to meet, or exceed, London Plan Space Standards, and sufficient manoeuvring space provided within each dwelling as part of Building Regulation Requirement Part M4(2) & Lifetime Homes criteria.

### **Residential Amenity of Neighbouring Properties**

- 6.35 The proposals have been carefully designed to ensure limited impact on the residential amenity of neighbouring dwellings.
- 6.36 The submitted Daylight Sunlight Study (Neighbouring) confirms that there will be no noticeable impact upon the light received by neighbouring properties. Although there will be isolated instances of a shortfall within rooms/windows within commercial buildings, the report demonstrates full compliance with BRE guidance and therefore recommends that the scheme is compliant in terms of impact upon daylight/sunlight amenity to neighbouring properties.
- 6.37 In terms of overlooking and loss of privacy, the only neighbouring building which is likely to present any issue is Lion House to the south – a five storey building with mixed commercial and residential use.
- 6.38 The scheme has been carefully designed however, to ensure the privacy of residents of both Lion House, and future occupiers of the proposed residential units. Where there is any potential for overlooking or loss of privacy to the rear of the building, high level screening is proposed to the first and second floors.

### **Affordable Housing**

- 6.39 Policy LP36 (Affordable Housing) sets out that for residential developments providing less than 10 units, on land where there is no loss of employment floorspace, a financial contribution will be sought. The affordable housing contribution is based upon the sales value of the properties, albeit the Council will have regard to the economic viability and individual site costs.

- 6.40 Richmond's Affordable Housing SPD differentiates between new build developments and conversions, recognising that development costs with regards the latter can be higher. However, the SPD sets out that some contribution will still be required.
- 6.41 In accordance with Policy LP36, should planning permission be forthcoming, a contribution for affordable housing will be sought through a Section 106 agreement. Accordingly, an Affordable Housing Commuted Sum Calculator has been submitted with this application, indicating a contribution of **£294,683** is generated by the proposed development. This calculation has been made on the basis of the proposed 6 units requiring a financial contribution of 24% provision towards affordable housing (as per the table defined within Policy LP36), with the development principally a conversion scheme, rather than a new build.

### **Flood Risk**

- 6.42 The site is located wholly within Flood Zone 1. The principle of residential development is acceptable within Flood Zone 1, and accords with Policy LP21 (Flood Risk and Sustainable Drainage) which states that development will be guided to areas of lower risk of flooding by applying the 'Sequential Test', as set out in national policy guidance.
- 6.43 Given the site is assessed as having the lowest risk of flooding, with less than 1 in a 1000 year chance of fluvial flooding, we consider that this is an appropriate location for residential development in line with Policy LP21.

### **Energy and Sustainability**

- 6.44 Local Plan Policy LP22 (Sustainable Design and Construction) states that new residential development (under 10 units or more) should achieve a 35% reduction in carbon dioxide emissions. This policy also however, recognises that there will be instances where this cannot be achieved. Any shortfall in on-site reductions may be offset through a cash-in-lieu contribution to the Council's Carbon Offset Fund.
- 6.45 An Energy Statement has been prepared by 'Energy Calculations Ltd.' and is submitted in support of this application. This Statement comprises two parts, assessing the converted residential units to the first floor and new built element.



- 6.46 The submitted Energy Statement confirms that with regards to the new-build element of the proposed development, the 35% reduction in carbon dioxide emissions is achievable. With regards the conversion element of the proposal however, owing to the inherent constraints in converting older buildings, this cannot be achieved. It is therefore proposed that a cash payment of **£10,744.50** is made towards the Council's Carbon Offset Fund. This figure has been calculated on the basis of the adopted London Plan which sets the calculation as £95/tonne per year over 30 years.
- 6.47 The Energy Statement confirms that the dwellings will achieve a maximum water consumption of 110 litres per person per day for home, in accordance with Policy LP22.
- 6.48 Policy LP22 also requires planning applications to be supported by a Sustainable Construction Checklist. A Sustainable Construction Checklist has been submitted in support of this application to meet this requirement.

### **Transport**

- 6.49 Policy LP45 of the adopted Local Plan states that new development must provide adequate parking for car, cycle, 2 wheel and, where applicable, lorry parking. Part 3 of this Policy however, states that car free development may be appropriate in areas assessed as PTAL 5-6.
- 6.50 Policy 3.16 of the adopted London Plan (2016) requires new development to accord with the maximum car parking standards set out within Table 6.2 of the Plan. For residential developments within areas assessed as PTAL 5-6 and in central locations, a *maximum* of 1 space per dwelling should be provided.
- 6.51 The New London Plan (Intend to Publish Version 2019) whereby Table 10.3 sets out that residential development within areas of PTAL 5-6 should be car free.
- 6.52 Owing to the sustainable location of the site within Richmond Town Centre, within immediate vicinity of shops, services and public transport, the proposed development proposal is 'car free'. This accords with Policy LP45 of Richmond's adopted Local Plan, the adopted London Plan (2016) and New London Plan (Intend to Publish 2019).
- 6.53 In terms of cycle parking, the proposal includes cycle parking to the ground floor of the building, adjacent to the entrance lobby. This comprises a minimum of 10

long stay and two short stay cycle parking spaces in line with Policy T5 of the New London Plan (intend to publish version 2019) which requires 1.5no long stay spaces per 1b2p dwelling, and 2no spaces for larger dwellings. 2no short stay spaces are required for 5-40 dwellings.

6.54 In terms of deliveries and refuse, there is an existing area to the rear of the building comprising a bin store, and where access to the building can be gained. Refuse collection and deliveries relating to the retail unit take place here and will be maintained. Additional bin storage will be provided for the proposed residential units.

6.55 The development is therefore considered to accord with relevant local and regional, and national policies in terms of transport.

### **Heritage**

6.56 Policy LP3 (Designated Heritage Asset) states that all proposals in Conservation Areas are required to preserve and, where possible, enhance the character or the appearance of the Conservation Area.

6.57 The application is supported by a Heritage Statement (prepared by Pegasus Group) which concludes that the proposed development will result in an enhancement to the Conservation Area, principally through the re-arrangement of the fenestration to the front elevation to No. 9.

### **Noise**

6.58 It is not considered the proposed development will have a detrimental impact on the aural amenity of surrounding occupiers, nor future occupiers of the development. If considered necessary, the Applicant will accept appropriately worded planning conditions to ensure that noise levels remain below acceptable limits (such as those imposed on planning permission 18/0322/FUL).

## 7. CONCLUSION

- 7.1 This proposal seeks an upward extension to the existing building of two storeys, and a change of use of the existing upper floors to provide 6 self-contained residential dwellings in C3 use.
- 7.2 The principle of residential here is considered acceptable in policy terms, and future occupiers will benefit from being extremely well located in terms of access to public transport, meaning the proposal can be car-free. Each of the proposed units exceeds the nationally described space standards and will provide an excellent standard of accommodation. In terms of neighbouring occupiers, it is not considered that this proposal will have a negative impact on overlooking/privacy, or by causing loss of daylight/sunlight.
- 7.3 The proposal also seeks to make alterations to the existing shopfront while maintaining the existing vacant retail unit. These alterations are considered to be a marked improvement on the existing shopfront, which is not a heritage asset and is not considered to make a positive contribution to the Conservation Area in which the site is located. These alterations will serve to improve the contribution of the shopfront to the streetscene and setting of the Conservation Area, while also serving to mitigate any impact of the proposed upward extension.
- 7.4 For the reasons set out above, it is considered that this proposal accords with the both national and local policies. As such, it is concluded that the proposal is acceptable in planning terms. Therefore, in the context of the presumption in favour of sustainable development, and Paragraph 11 of the NPPF, this proposal should be approved without delay.

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