



APRIL 2021

Planning Statement

54 George Street, Richmond

ICENI PROJECTS LIMITED
ON BEHALF OF LOMBARD
ASSET 54 GEORGE STREET
TW9 LTD (C/O DALESFORD
ESTATES)

Iceni Projects Limited on behalf of
Lombard asset 54 George Street TW9 Ltd
(c/o Dalesford Estates)

April 2021

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54 GEORGE STREET, RICHMOND

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1. INTRODUCTION

1.1 This Planning Statement has been prepared by Icen Projects Limited (Icen) on behalf of our client 'Lombard asset 54 George Street TW9 Limited, % Dalesford Estates Limited' (the 'Applicant'). The statement has been prepared in support of a detailed planning application for the residential conversion and associated alterations of the upper floors of 54 George Street in Richmond (the 'Site'). The Site is located within the London Borough of Richmond upon Thames (LBRuT) administrative boundary.

1.2 The applicant is seeking planning permission for the following:

Change of use part basement, part ground floor, first and second floor from retail (Class E) to residential use (Class C3) to create 8 residential flats; together with alterations and associated development.

Structure of Planning Statement

1.3 The purpose of this Statement is to provide an overview of the existing Site, the Site history, review of the relevant planning policies and to provide justification for the proposed development taking into account the relevant material planning considerations.

1.4 The Statement is structured in the following format:

- Section 2 – The Application Site and Surrounds;
- Section 3 – The Development Proposals;
- Section 4 – Planning Policy Summary;
- Section 5 – Planning Considerations; and
- Section 6 – Conclusions.

2. THE APPLICATION SITE AND SURROUNDINGS

Site and Surroundings

- 2.1 The application Site is located on George Street, a primary road and part of the 'High Street' through Richmond town centre. The surrounding area is typical of a historic town centre such as Richmond, with buildings being a wide variety of ages and styles; ground floor retail premises, and retail or commercial premises on the upper floors. Some premises have residential premises on the upper floors.
- 2.2 Primary frontage for the Site is to George Street on the eastern boundary, with a secondary frontage to the south onto Brewers Lane – a pedestrian lane providing access from George Street through to Richmond Green. To the west and north, the Site immediately adjoins part two / part three storey commercial premises.

The Site

- 2.3 The Site measures approx. 0.01ha and contains one building with a large footplate over four floors. The building comprises a basement storage area, ground floor primary retail space; and the two upper floors that are the subject of this application. The building was previously occupied by Topshop across all four floors – storage at the basement, retail at ground and first floor, and storage and back of house on the second floor. The building is currently vacant however, following internal fitout of the ground and basement levels, the intention is to re-let the ground and basement for retail as soon as possible.

Access

- 2.4 The building is setback from George Street when compared to the wider streetscene, and this allows a slightly wider pavement at this point with room for a bus stop immediately to the front of the Site. The bus stop serves surrounding local and regional destinations in south-west London. The Site is a 3 minute walk to the south of Richmond Station that provides regular services tube and overground services into central London.
- 2.5 The Site has excellent access to public transport with a Public Transport Accessibility Level (PTAL) of 6a. The Site is also located within a Controlled Parking Zone (CPZ).

Designations

- 2.6 There are a number of heritage designations applicable to the site. The application site is split between two Conservation Areas. The front part of the building (fronting George Street) is located within the Central Richmond Conservation Area (CA17); whilst the rear is within the Richmond Green

Conservation Area (CA3). The site is also locally listed as a Building of Townscape Merit (BTM), recognising it as a significant contributor to the character of the area.

- 2.7 Although the building itself is not listed by Historic England, it is in close proximity to numerous listed buildings – particularly along Brewers Lane. Buildings immediately adjacent to the north-west of the site are listed (No. 3 Brewers Lane: Grade II, and Britannia Public House: Grade II). In addition, the buildings on the opposite corner of Brewers Lane/George Street (No.'s 2,4 & 6 Brewers Lane: Grade II, and No. 8 Brewers Lane: Grade II); and opposite the site (Greyhound House, George Street: Grade II) are also listed.
- 2.8 It is also understood that the site may be within an Archaeological Priority Area (AAP), and that the AAP for London Borough Richmond upon Thames is currently under review by Historic England. Further details are not currently available.
- 2.9 Given the location within the Richmond town centre, the Site is also designated as a 'Key Office Area', a Key Shopping Frontage, and part of Take Away Management Zone.

Planning History

- 2.10 LBRuT's online planning register notes that the site has been subject to a number of minor planning consent applications since 1965 – primarily related to the historic retail use of the premises. Table 1 below, provides a summary of the most recent and relevant applications:

Table 1: Planning History

| LPA Reference | Proposal | Decision |
|----------------------|--|---|
| 20/3285/FUL | Part infill second floor and roof, replacement windows/doors and new doors on ground floor side elevation to facilitate the change of use of part ground floor and first and second floors from retail (Class E) to residential use (Class C3) to create 8 residential flats | Withdrawn |
| 12/0924/ADV | Additional 2no. lighting LED ecolux strips fixed to existing fascia above existing non-illuminated shopfront fascia lettering | Approved 16/05/2012 |
| 11/0860/FUL | Relocation of existing single side escape door to side elevation (Brewers Lane) | Refused 11/05/2011 |
| 11/0233/FUL | New roof plant for refurbishment of existing retail unit. | Approved 27/02/2011 |
| 10/3014/ADV | New fascia and project sign | Approved 05/01/2011 |
| 10/3013/FUL | Refurbishment of existing retail unit including new shopfront | Approved 05/01/2011 |
| 02/2669/ADV | Erection of non-illuminated projecting sign | Approved 07/10/2002 |
| 02/1823/ADV | Projecting shop sign internally illuminated | Refused 23/07/2002 |
| 02/1822/FUL | Provision of new shopfront and entrance | Approved 22/07/2002 |
| 97/0216 | Installation of Five External Roof Mounted Air Conditioning Units | Decided as no further action to be taken 23/04/1997 |

| | | |
|--------------------|--|---------------------------------|
| 96/2080/ADV | Internally Illuminated Halo Lit Fascia Letters | Approved 18/09/1996 |
| 94/3668/FUL | Change of Use from Class A1 (Shops) to Class A2 (financial and Professional Services). | Appeal withdrawn on 26/10/1995. |
| 92/0174/FUL | New Fire Exit in side wall opening into Brewers Lane (NB: 53-54 George Street) | Approved 01/04/1992 |
| 88/0960/ADV | Fascia and Projecting Box signs | Approved 01/08/1988 |
| 88/0959 | New Shopfront | Approved 01/08/1988 |
| 86/1316 | Alterations to shopfront | Approved 25/11/1986 |
| 85/1761 | Alterations to shopfront | Approved 06/05/1986 |
| 85/1742/ADV | Internally illuminated fascia sign. | Approved 06/05/1986 |
| 84/0110 | Alterations to shopfront | Refused 25/04/1984 |
| 84/0083/ADV | For advertisements | Refused 25/04/1984 |
| 79/1166 | Installation of new shopfront | Approved 05/12/1979 |
| 79/1126/ADV | For advertisements | Approved 04/12/1979 |
| 77/0133/ADV | For advertisements | Approved 20/06/1977 |
| 77/0132 | Installation of a new shopfront | Approved 20/06/1977 |
| 74/0679 | Provision of new shop fronts at front and side. | Approved 04/09/1974 |
| 74/0680/ADV | For Advertisements | Approved 04/09/1974 |
| 65/0383 | Erection of an Electricity Sub-Station | Approved 05/07/1965 |

- 2.11 There is no later planning history for the Site. The entire premises have until recently been used for retail Class A1 (Topshop), now defined as Class E under the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.

Recent occupation history

- 2.12 Topshop has been a long-term tenant and previously occupied the whole building. On 29 May 2019, Topshop entered into a Company Voluntary Arrangement (CVA) and outlined their intention to vacate the premises due to structural changes within the retail market. On 25 June 2020 Topshop physically vacated the premises.
- 2.13 The site was initially marketed through CBRE from May 2019. It has now been re-marketed through GCW since January 2020. To date the premises remains vacant with no Heads of Terms (HOTs) being agreed for a new tenant. Since marketing the premises, other businesses in the area have become available - Massimo Dutti, Debenhams, Paperchase, Carphone Warehouse, Cos & Vision Express to name just some of the larger occupiers. By comparison, we understand that there were no vacancies during the initial marketing campaign in 2019.
- 2.14 Since the previous application (now withdrawn) the applicant has continued to market the premises and has had some interest in the smaller retail space of just the ground and basement levels, and in some instances only the ground floor. This continues to reflect the volatile nature of the retail sector at the present time.

Pre-application meeting (2018)

- 2.15 In 2018 the previous owner of the Site sought pre-application advice for the conversion of the upper floors into 4 no. residential units (LPA ref: 18/P0317/PREAPP).
- 2.16 The pre-application advice was supportive of the principle of the development in this location, subject to clarification on the continued provision of viable retail space on the lower floors. The yield of the site was also queried and thought to be an 'ineffective use of the land' given the generous sizes of the flats. The advice also noted that any future application would need to be accompanied by appropriate details in terms of external alterations, design and character, highways and servicing, residential living standards and amenity, sustainability, and affordable housing.
- 2.17 This pre-application advice has formed the basis of design review for the scheme moving forward.

Withdrawn Planning application (2020)

- 2.18 In November 2020, an application was made for the conversion of the upper floors of the building together with external alterations to facilitate the conversion of the building. During the course of the application, the Planning Officer raised a number of concerns regarding the proposals. While some of these matters were clarified with officers, further technical reviews were needed; and ultimately the application was withdrawn to allow further consideration of the design.
- 2.19 This application is a resubmission of that application and follows various technical assessments that have guided changes to the previously submitted design including:
- BREEAM Pre-assessment (Encon Assessments);
 - Sunlight/Daylight Technical Note (Iceni);
 - Noise Impact Assessment (CSP Acoustics); and
 - Heritage Statement (Iceni).
- 2.20 The following table sets out the matters raised by the officer regarding the previous submission, alongside a column outlining with how each matter has now been addressed. These matters are also addressed in more detail in Section 5 of this report.

| LPA concerns | Design Response |
|---|--|
| Overlooking / outlook | |
| Overlooking between the elevated outdoor terrace of the Britannia Pub and the | A winter garden has been created to the living areas of Flats 1 and 7 by retaining the existing building line and windows, and |

| | |
|---|--|
| residential units – Flat 1 in particular | <p>constructing a new internal wall. A low parapet is also now proposed on the boundary wall with the Britannia Pub.</p> <p>The existing change in level between the elevated terrace beer garden of the Britannia Pub and the Site, together with the low parapet wall at the boundary and the new winter gardens, effectively set the main building line of the new flats further back, and will prevent direct over-looking between residents and the elevated terrace; and ensure that an appropriate level of amenity is created commensurate with this historic urban context.</p> |
| Overlooking between Flat 1 and Flat 8 into the rear of No. 3 Brewers Lane. | <p>The upper floors of No. 3 Brewers Lane are not residential and are part of the BOH area for the retail premises; and, although the windows are physically close, it is an indirect view at an angle which ensures that overlooking is not to a harmful level and the relationship is appropriate in this regard.</p> <p>However, to further minimise opportunity for direct overlooking between neighbouring properties, a small inset balcony has been incorporated that brings back the main building line of these rooms in Flats 1 and 8.</p> |
| Outlook for residential units facing onto Brewers Lane | <p>Sections through Brewers Lane were submitted as part of post-submission discussions on the withdrawn application. These included a cross section through Brewers Lane and clearly demonstrated the relationship between the proposed residential units and neighbouring properties, and specifically that there was sufficient outlook across the roofs of the neighbouring buildings.</p> <p>This was accepted by the officer and these details have been incorporated into the scheme forming this application (Dwg. No. GSR/PL/204).</p> |
| Noise | |
| Noise from patrons at the Britannia Pub, and the outside terrace and beer garden in particular, affecting the residential units at the rear | A Noise Impact Assessment (NIA) has been submitted with this application. The proposal includes the specification of acoustic glazing and trickle vents for all windows, including those directly facing the Britannia beer garden and terrace. Acoustic glazing will provide suitable mitigation against harmful levels of noise, and ensure the occupants of the new residential units have an appropriate level of amenity. |
| Noise from plant and machinery on flat roof of the adjoining commercial buildings affecting residents | A Noise Impact Assessment (NIA) has been submitted with this application and includes an assessment of the nearby plant. The proposal includes the specification of acoustic glazing and trickle vents for all windows. This will provide appropriate mitigation against any harmful levels of noise and ensure the occupants of rooms nearest the plant will have a satisfactory level of amenity. |
| Sunlight/Daylight | |
| Sunlight/Daylight for the units at the rear of the building | <p>The current scheme with winter gardens, has been assessed and a Sunlight/Daylight Technical note submitted with this application.</p> <p>All rooms meet, or exceed, BRE requirements with the exception of sunlight levels to the living area of Flat 8. The living area of Flat 8 includes an inset balcony to address overlooking concerns and also faces a blank wall. While the balcony impacts the level</p> |

| | |
|---|---|
| | <p>of sunlight into the room, it provides additional amenity space and limits over-looking. Flat 8 also benefits from south facing windows and has adequate sunlight. Therefore Flat 8 as a whole has a good level of amenity, and overall the assessment concludes this is acceptable for dwellings in an urban context.</p> |
| Design | |
| <p>Need to further justify the alterations to Brewers Lane elevation and in particular the proposal for timber sash windows</p> | <p>A Heritage Statement (HS) has been submitted with this application outlining the various changes to the building(s).</p> <p>It is proposed to install timber sash windows. This is consistent with the main elevation to George Street, which is the original building and understood to have originally been residential before the more recent conversion to a retail premises. As such, the windows respect the historic fabric of the original building and will be in keeping with the wider area.</p> |
| <p>Need to further justify the alterations to Brewers Lane elevation and in particular the opening up works for windows and ground floor doors</p> | <p>The Heritage Statement submitted with the application provides further details on the history of the site and various changes to the building(s) including the historic openings to Brewers Lane; and notes that this was previously a more active frontage to the building in addition to the George Street elevation.</p> <p>The alterations to the Brewers Lane elevation will reinstate openings that were bricked up some decades ago. The statement concludes that this work, together with the proposed window alterations and/or new openings, are entirely appropriate. Furthermore, the works will reinstate this as an active frontage in addition to the George Street elevation and will enhance the buildings contribution in the Conservation Areas and setting of the listed buildings.</p> <p>Similarly, historic openings for doors will be reinstated and suitably detailed. Repurposed doors found on-site will be used for the residents entrance and a stable style door to the bins store is proposed and in keeping with the historic function of this previously blocked opening.</p> <p>Overall, these openings are needed to facilitate the conversion of the upper floors and were considered acceptable in principle by officers subject to further details. The Heritage Statement outlines the numerous changes that have occurred to the building; and concludes that reinstating and altering this elevation is considered entirely appropriate; will not result in harm to the building, or its importance and value within the Conservation Areas, and will in fact enhance the buildings contribution to the Conservation Areas.</p> |
| <p>Officers noted that the preferred drag distance for bins to the lorry is 20 metres, and the bin store would be 23 metres from the nearest kerb. It was requested that the bin store be moved closer.</p> | <p>The measured distance from the doors to George Street kerb is 21 metres and therefore only 2 metres less than required. While the applicant understands the need to minimise the drag distance, in this instance it would result in changes to the external and internal fabric of the building.</p> <p>Internal changes to locate the bins away from the stairs would alter the large open floorplate of the retail space and potentially impact on the active frontage of the building. Externally, a large new opening would be required to the Brewers Lane elevation,</p> |

| | |
|---|--|
| | likely near the existing historic opening, resulting in an incongruous detail on this elevation. On balance, this level of change is not considered justifiable and the location of the bin store has not been changed from the previous application. The Planning Officer previously accepted this was appropriate in the context of the conversion of an existing building. |
| Officers sought clarity on what was proposed in terms of sustainability measures. | A BREEAM assessment has been prepared and is submitted with this application. Further details are provided later in this report. |

Consultation comments

2.21 In addition to discussions with officers three objections were received in respect of the previous application. Although not opposed to the principle of converting the building to residential use, a number of points were raised and are addressed as follows:

- Overlooking and loss of privacy from rear elevation – Windows at the lower levels were previously covered as part of to the internal fitout of Topshop, and the upper floors were used for storage only. The building line of the application site varies from 24 to 25 metres from rear building line of the terraces fronting in Richmond Green. This complies with the LBRuT Policy LP 8 guideline of 20metres; and this is not an uncommon relationship between building in a built up urban area. The introduction of wintergardens to the design will further reduce any opportunity for direct overlooking;
- Impact on the Conservation Area and importance of the rear elevation – Although the entire building contributes to the CA's, it is the context of the building in the wider streetscene that is of particular value. The George Street and Brewers Lane elevations are identified in the Heritage Statement as being of particular value to the wider Conservation Area. Although the rear of the building is visible from adjoining buildings; it has changed considerably over time and is not the main value of the site within the CA. Therefore the preservation of this elevation cannot be given undue weight within the wider CA's;
- Amenity – a Noise Impact Assessment has been provided that assessed the site and surrounding area, and proposes acoustic windows to mitigate against noise and ensure an appropriate level of residential amenity to residents within this urban setting;
- Submitted information – these matters have been addressed (i.e. drawings updated); and/or can be subject to condition (i.e. Construction Management Plan); or are simply not material planning considerations (i.e. building control); and
- Drainage – we note concerns raised by Courlanders regarding drainage but point out that this Site is not directly adjacent to Courlanders, and does not benefit from permission for the work

described in the objection. Therefore this issue appears to refer to No. 57 George Street and is not relevant to this proposal.

2.22 In summary, the applicant has reviewed and addressed the comments regarding the previous application from both the LBRuT Case Officer and neighbouring residents. The current application is therefore considered entirely acceptable.

3. THE DEVELOPMENT PROPOSALS

3.1 The Site has previously been occupied in its entirety over the four floors for retail purposes. However the changing retail market and well-documented impact on local high streets (even before Covid-19); mean that such a large retail premises are surplus to most tenant requirements, and this is the case with this building.

Overview

3.2 In light of the above, the applicant is seeking to convert the upper two floors into 8 no. residential units. The ground floor and basement will continue to be for retail use and are not part of this application other than to allow enabling works for the residential floors above.

3.3 To facilitate the proposed change of use, internal and external alterations are required. This is detailed in the accompanying drawings submitted with the application and includes:

- Installation of a new residential entrance door to Brewers Lane;
- Reinstate historic opening under existing decorative arch and installation of new refuse double door to Brewers Lane;
- Infill dormer at second floor level on Brewers Lane elevation;
- Remove existing louvre at ground floor level to Brewers Lane elevation and replace with new display window;
- Reinstate 3 no. blocked up window openings and install timber sash windows, replace 3 no. existing windows with timber sash windows, and modify 3 no. existing openings and install 3 no. new timber sash windows on Brewers Lane elevation;
- Infill existing light well to the side (north-east) elevation light well and installation of 3 no. new timber sash windows; and
- Alterations to the rear north-west elevation including infill the existing covered yard, remove disused vent stack, and construct partial roof extension; remove 8 no. existing windows, create 4 no. winter gardens and install 6 no. timber sash windows to the rear (north-west) elevation.

Retention of retail - Ground and Basement level works

3.4 As noted already, the continued retail use of the ground floor and basement levels are not part of this application, however some internal enabling works are required for the conversion of the upper floors. This work includes stripping out the retail fitout and materials from the previous tenant, making good existing surfaces, waterproofing and repair to the existing basement. An internal stair between the ground floor and basement level that was previously blocked up, will be reinstated. This work

does not require planning and has already commenced to enable occupation of the retail level for a future tenant.

- 3.5 No changes are proposed to the George Street retail shopfront, with the existing access to the premises on George Street to be retained. On Brewers Lane, an existing louvre will be removed and a new shop window to match the others installed. The existing single door fire exit onto Brewers Lane will also be retained.
- 3.6 Access from the existing retail space to the existing stair well onto Brewers Lane will be removed, and a small refuse area constructed. The refuse area will be accessed via new double doors onto Brewers Lane that will be installed in a reinstated opening under the existing decorative arch (refer Dwg. No. GSR/PL/206).
- 3.7 Overall, the total retained retail floor area will be 467.45sqm, comprised of 270.68sqm primary large format floor at ground floor, and 196.77sqm at basement level.

Residential units

- 3.8 It is proposed to convert the upper floors of the building into eight new residential units. A secure entrance for residents will be provided from Brewers Lanes using the existing fire escape stairwell. This entrance will be separate to the retail premises. It is proposed to install reclaimed double entrance doors found stored on site during the strip-out works from the previous retail fit-out (refer Dwg. No. GSR/PL/206).
- 3.9 The existing fire exit stairs to Brewers Lane will be retained to provide access to the residential units above. This will also provide access to part of the basement level for cycle storage and retain the existing substation access. The existing stairs will terminate at the first floor level and a new internal stair will be constructed to give access to four units on the second floor.
- 3.10 Part of the basement will be separated from the retail area to provide cycle parking and lockers for residents. This basement area was used by the previous tenants for stairs and back-of-house functions.

Residential Unit Mix

3.11 The proposed development will deliver a mix of new units, as set out in Tables 2 and 3 below:

Table 2: Residential Unit Mix

| | Units | |
|--------|-------|-------|
| Studio | 1 | 12.5% |
| 1B2P | 6 | 75% |
| 2B4P | 1 | 12.5% |
| Total | 8 | |

Table 3: Accommodation Schedule

| | Unit Size | Area |
|--------|-------------|----------|
| Unit 1 | 1B2P | 55.95sqm |
| Unit 2 | Studio (1P) | 41.56sqm |
| Unit 3 | 1B2P | 63.40sqm |
| Unit 4 | 1B2P | 50.07sqm |
| Unit 5 | 1B2P | 51.28sqm |
| Unit 6 | 1B2P | 50.17sqm |
| Unit 7 | 1B2P | 57.50sqm |
| Unit 8 | 2B4P | 77.67sqm |

External alterations

- 3.12 The proposed development is primarily for the change of use to the upper two floors of the existing building. However to facilitate this change of use, minor external alterations are required.
- 3.13 These changes are predominantly at the second floor level and seek to regularise the changes in floor level and various roof forms – particularly at the north-east corner of the building, thus allowing a more regular layout for the new units.
- 3.14 As shown on the existing plans, there is an existing internal stair case in a large open double height room at the rear north-western corner of the building. Half way up the stair is a small store room, before the stairs continue to the second floor level. To facilitate a more regular layout and function for Flat 07, the proposal is to remove the stairs and small store, extend the second floor level and partially increase the height of the rear wall at this corner of the building. This will then provide a better use of the space for the open plan kitchen/living area of Flat 07. This work is to the rear of the building that is not visible from any public street.
- 3.15 On the first floor level, an existing courtyard / lightwell on the north-west elevation will be infilled to create a better layout for kitchen/living room's of Flat 01 and Flat 7 over. An new internal building line will be constructed to create small winter gardens on this elevation. On the north elevation, an existing lightwell will be infilled and new windows installed to the bedrooms of Flat's 1, 6 & 7.

3.16 An existing part mansard to the second floor level on Brewers Lane, will be removed and a wall built up to match the external walls either side. This will remove the sloping roof over what will be the kitchen to Flat 08.

3.17 Although new windows are to be installed on the Brewers Lane elevation, these have been located to utilise former window openings that were historically 'blocked up' or alter existing openings, rather than create entire new openings entirely.

Design and Materiality

3.18 As outlined above, the proposed development includes some changes to the external appearance of the building. New windows will be timber sashed windows to match existing / original windows on George Street; with acoustic double glazing to provide modern sustainable sound and heat insulation and the brick surrounding the window openings repaired (as needed) in brick to match the existing.

3.19 Similarly the brick infill to the mansard roof; and the rear alterations and roof infill will be of high quality Reclaimed Mixed London Stock brickwork to match the existing walls either side.

Car and Cycle Parking

3.20 Given the Site's central location and excellent access to public transport, no residential parking is proposed. A total of 14 no. cycle parking spaces will be provided at basement level along with secure lockers for residents to securely store bike accessories, tools, helmets and so on.

Refuse and Servicing

3.21 No change is proposed to the current servicing arrangements for the ground floor and basement retail premises, with deliveries and collections continuing to be from George Street.

3.22 A new refuse store will be provided with access of Brewers Lane, for both waste and recycling. This allows for 1 x 1100L general waste euro bin and 2 no. 660L recycling bins. There is also space for an additional 240L bin should the proposed food waste recycling service become available in the future in LBRuT. This will be for residents and will be privately managed for regular collection.

4. PLANNING POLICY SUMMARY

4.1 This section outlines the relevant planning policy context for the proposed development at national, regional and local levels; and considers the statutory development plan policies as well as other material considerations.

4.2 The proposals will be assessed against:

- LBRuT Local Plan (2018); and
- The London Plan (2021).

4.3 The following supporting documents are material considerations in relation to this proposal:

- The National Planning Policy Framework (July 2018);
- The London Plan (intend to publish, 2019);
- London Plan Housing Supplementary Guidance SPG (March 2016);
- National Design Guidance; and
- various LBRuT Supplementary Planning Documents.

LBRuT Local Plan (2018)

4.4 The following policies of the LBRuT Local Plan (2018) are considered relevant to the proposals:

LP1: Local Character and Design Quality

4.5 Council require all proposals to be of high quality architecture and urban design quality given the character and heritage of the borough. Key considerations for any proposal include:

- Compatibility with the local character in terms of townscape, development patterns, views, local grain and frontage, scale, height, massing, density, landscaping, proportions, form, materials and detailing;
- Sustainable design and construction (subject to aesthetic considerations);
- Layout, siting and access to make the best use of the land;
- Relationship between buildings including heritage assets;
- Inclusive design, connectivity, permeability and natural surveillance; and
- Suitability of compatible uses.

4.6 Council will resist the removal of shopfronts of architectural and historic interest.

LP3: Designated Heritage Assets

- 4.7 Proposals will be considered against any adverse effects on significant heritage assets and seek to avoid harm to such assets. All proposals in Conservation Areas are required to preserve and, where possible, enhance the character of the Conservation Area.

LP4: Non-designated Heritage Assets

- 4.8 The Council will seek to preserve, and where possible enhance, the significance, character and setting of non-designated heritage assets, including Buildings of Townscape Merit, memorials, particularly war memorials, and other local historic features.

LP8: Amenity and Living Conditions

- 4.9 All proposals are required to protect the amenity of both new and existing residents. Council will seek to ensure the design and layout of the buildings provide a good standard of sunlight/daylight. Proposals should not result in unacceptable loss of amenity such as noise and over-looking (e.g. the location and size of terraces and balconies). The bulk, scale and massing of a proposal should not have a detrimental or over-bearing impact on adjoining residents. Proposals should not result in a harm to reasonable enjoyment of adjoining buildings through servicing, light, noise, odours, micro-climate, air pollution and so on.

LP10: Local Environmental Impacts, Pollution and Land Contamination

- 4.10 The Council will seek to ensure that local environmental impacts of all development proposals do not impact on the occupants (new and existing), including: air quality, noise and vibration, light pollution, odours and fume control, land contamination, construction and demolition.

LP22: Sustainable Design and Construction

- 4.11 Development are required to achieve the highest standard of sustainable design and construction. Development of one dwelling or more are required to complete the Sustainable Construction Checklist SPD, incorporate required water conservation measures (<110sqmL/person/day), meet BREEAM Domestic Refurbishment 'Excellent' standard (where feasible). Measures to improve energy conservation and efficiency are also required with projects less than 10 units to achieve a 35% reduction in CO2 emissions. It is acknowledged that retro-fitting may not always make the targets achievable and applicants should complete the Sustainable Construction Checklist SPD as far as possible.

LP24: Waste Management

- 4.12 Waste is to be managed in accordance with the waste hierarchy – reduce, reuse, recycle. All proposals, including change of use, are to provide adequate refuse and recycling for residents as set out in the Waste SPD. Waste storage facilities should be appropriately designed as part of the overall scheme and sensitive to local character and design. A site waste management plan may be required for some schemes.

LP25: Development in Centres

- 4.13 Development within the borough's centres will be acceptable where it is appropriate to the centre's role and function; is in an appropriate location; does not adversely impact the vitality and viability of the centre, particularly in terms of retail; optimises the sites potential by enabling a suitable mix of uses that enhance the vitality and viability of the centre and noting a shortage of retail units with large floor-plates. Commercial premises should be retained to the street frontage; although it is acknowledged that, among other uses, town centre locations are also appropriate for '*higher density residential development comprising small units; car free development*'.

LP26: Retail Frontages

- 4.14 Council seeks to protect Key Shopping Frontages within town centres and the loss will be resisted. Notwithstanding, residential conversion of upper floors is considered acceptable, provided the ground floor retail frontage is preserved. Where possible the residential access should be to the rear of the site.

LP34: New Housing

- 4.15 The Council has a minimum target of 3,150 new homes for the 10 year period from 2015 subject to any future revisions by the London Plan. This includes 1000 – 1050 new units within Richmond. Although the council has been on track to meet these targets, increase by the GLA, and landuse constraints will potentially put pressure on achieving these rates in the long-terms. Therefore proposals should optimise the potential of all sites.

LP35: Housing Mix and Standards

- 4.16 Housing mix within the five town centres should be appropriate to the site-specifics of the location. All new housing should meet the Nationally Described Space Standards as a minimum. New development, including conversions, should provide adequate amenity space.

LP36: Affordable Housing

- 4.17 Council expects all Sites to contribute to affordable housing. On sites below the 10 unit threshold, a financial contribution will be required commensurate to the scale of the proposal and the Affordable Housing SPD. When considering the maximum reasonable amount of affordable housing contribution, Council will have regard to the economic viability, individual site costs, availability of a public subsidy, and the overall mix of units and planning benefits. If a reduction is sought, a viability assessment must be provided.

LP44: Sustainable Travel Choices

- 4.18 The Council will seek to ensure there is an appropriate level of safe, sustainable, and accessible transport solutions for all proposals.

LP45: Parking Standards and Servicing

- 4.19 New development is required to make provision for an appropriate level of parking to meet the needs of residents, but also minimising impacts of car based travel. Car free development is considered acceptable in area with a high PTAL rating of 5 or 6, subject to the provision of disabled parking, appropriate servicing arrangements, and demonstrating that proper control can be put in place to ensure that the proposal will not contribute to local parking stress. All proposals for car free housing will need to be supported by the submission of a Travel Plan. Cycle parking is also to be provided, to London Plan standards.

London Plan (2021)

- 4.20 In July 2011, the Mayor published the replacement of the spatial development strategy for London – known as the London Plan. The London Plan is the overall strategic plan for London, and it sets out a fully integrated economic, environmental, transport and social framework for the development of the Capital to 2031. There have been numerous amendments since the original 2011 publication, with the most recent amendment being published in March 2021.
- 4.21 The London Plan sets out the Greater London Authorities ('GLA') planning policies for London and gives guidance on how these policies are expected to be applied. Although this is only a minor application, and therefore not of strategic importance, the site is within MOL and therefore consideration has been given to the following London Plan policies.
- 4.22 The following London Plan Policies are also considered relevant:
- Policy D1 London's form and characteristics states that development proposals should respond to the existing character of a place by identifying the special and valued features that are unique to the locality. Schemes should also be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well.
 - Policy D3 Optimising Site Capacity Through the Design-led Approach seeks to ensure that development makes the best use of land by optimising the capacity of sites and ensuring they are the most appropriate form and land use for the site. Higher density developments should be located in locations that are close to jobs, services, infrastructure and amenities all served by sustainable transport means.
 - Policy D6 Housing Quality & Standards requires proposals to be of high quality design and provide adequately sized rooms with comfortable and functional layouts. Single aspect units should be avoided where there is no other design solution. Due consideration is to be given to

minimum space standards and design, Sunlight/Daylight, passive ventilation, privacy, over-heating, amenity space, waste;

- Policy H1 Increasing Housing Supply seeks increase the overall supply of housing within London during the plan period. The minimum ten-year housing target for LBRuT is 4,110 residential dwellings for the borough (2019/20 – 2028/29) at an annual rate of 411 dwellings per annum
- Policy H10 Housing Size Mix aims for an appropriate mix of unit sizes and tenure across a scheme as appropriate, with a higher proportion of one and two bed unit within town centre locations and the overall aim of optimising housing potential on sites;
- Policy HC1 Heritage Conservation and Growth requires proposals that affect heritage assets and their settings to be sympathetic to the assets significance and surrounding context. Proposals should avoid harm to these assets and instead identify opportunities for enhancement.
- Policy T5 Cycling sets out the requirements and guidelines for cycle parking noting that cycle parking provision should be fit for purpose, secure and well-located; and
- Policy T6 Car Parking states that car parking should be restricted in line with current and future levels of public transport accessibility, with car-free development the starting point for proposals.

Material Considerations

National Planning Policy Framework (2019)

- 4.23 The National Planning Policy Framework (NPPF) was first adopted in March 2012, and subsequently revised on July 2018 and most recently 19 February 2019. The NPPF sets out the Governments planning policies for England and how these are expected to be applied. The NPPF provides a strategic direction for planning and must be taken into account in the preparation of local and neighbourhood plans and is also a material consideration in planning decisions.

Sustainable Development

- 4.24 Paragraph 8 of the NPPF specifically sets out the basis for the achievement of sustainable development in planning terms and defines three key objectives in the planning system:
- An economic objective – to encourage a strong and competitive economy, by making sure that the right type of land is available in the right places to support growth and improved productivity, as well as co-ordinating the provision of infrastructure;
 - A social objective – to support strong, vibrant and healthy communities, by making sure that a sufficient number and range of homes can be provided; and

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- An environmental objective – to contribute to protecting and enhancing our natural, built and historic environment, including making efficient use of land.

4.25 Giving further weight to these principles, Paragraph 10, state that ‘a *presumption in favour of sustainable development*’ is at the heart of the framework.

4.26 Having regard to decision making, Paragraph 11 states that ‘*Proposals that accord with an up-to-date development plan should be approved without delay*’; and Para 38 notes that local planning authorities (LPA’s) should approach decisions on proposed development in a positive way, and work proactively with applicant to secure development that will improve the economic, social and environmental conditions of an area.

Supply of new homes

4.27 Chapter 5 of the NPPF places significant emphasis on significantly boosting the supply of housing to meet identified needs. Paragraph 73 identifies the requirement for Local Planning Authorities to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement.

Requiring Good Design

4.28 The NPPF encourages Local Planning Authorities to consider the use of design policies to guide development without enforcing unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally.

4.29 The aspiration for the creation of high-quality buildings and places is outlined in Paragraph 124. Good design is considered fundamental to what the planning process should achieve and is a key aspect of sustainable development. Being clear about design expectations is essential for achieving this. Paragraph 127 states planning decisions should ensure that developments:

- Will function well and add to the overall quality of the area, over the lifetime of the development;
 - Are visually attractive as a result of good architecture, layout and appropriate landscaping;
 - Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- Establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

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- Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
 - Create places that are safe, inclusive and accessible and which promote health and well-being with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

Promoting Sustainable Transport

- 4.30 Another key facet of the NPPF is the promotion of sustainable transport. The NPPF encourages solutions that can support a reduction in greenhouse gas emissions. Decisions should take account of opportunities for sustainable transport modes given the location and nature of the site. Paragraph 102 highlights that opportunities to promote walking and cycling should be pursued.

Making Effective Use of Land

- 4.31 Paragraphs 117 and 118 of the NPPF promote the efficient use of land, stating that decisions should promote and support the development of under-utilised land and buildings, especially if this would help to meet the identified needs for housing where land supply is constrained, and available sites could be used more effectively (for example converting space above shops). It also seeks to support opportunities to use the airspace above existing residential and commercial premises for new homes, particularly where development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well designed and can maintain safe access and egress for occupiers.

Heritage

- 4.32 Paragraph 185 states that local planning authorities should set out in the Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets. Paragraph 189 states that the level of detail provided with an application should be proportionate to the assets importance and no more than is sufficient to understand the potential impact of the proposal on their significance.
- 4.33 Paragraph 192 identifies the following key points that local planning authorities should take account of the following when determining planning applications:
- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

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- the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - the desirability of new development making a positive contribution to local character and distinctiveness.

4.34 When considering the impact of a proposed development on the significance of a designated heritage asset, Paragraph 193 states great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, Paragraph 196 states that this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

London Plan Housing SPG (March 2016)

4.35 This SPG provides guidance on the implementation of housing policies within the adopted London Plan (March 2016), setting out commentary with regards to housing supply, housing quality, housing choice, social infrastructure and mixed-use developments.

National Design Guide

4.36 This guide illustrates how well-designed places that are beautiful, enduring and successful can be achieved in practice and in particular how the characteristics of well-designed places can be achieved. It demonstrates what good design means in practice.

LBRuT Supplementary Planning Documents

4.37 The following Supplementary Planning Documents (SPD's) are material considerations to any planning applications within LBRuT.

Affordable Housing

4.38 This SPD relates to the requirement for affordable housing to be provided on all sites across LBRuT. In the context of the local area, small sites make a significant contribution to the housing supply and this policy seeks to ensure the cumulative impact of these sites also contributes to affordable housing. As such, local policy requires all new residential developments to provide either on-site affordable housing or an agreed commuted payment towards the provision of local affordable housing. This includes proposals for a change of use to residential or mixed use incorporating affordable housing; as well as sites less than 10 units. On site less than 10 units, a financial contribution is acceptable and is based on the value of the proposal. A sum calculator is provided and a variation to this calculation may be acceptable but will be subject to a separate viability assessment and discussions with the LPA.

Buildings of Townscape Merit

- 4.39 Across the borough many buildings and structure are valued due to the historical association, architectural style and visual interest, or siting within an area of significance. The Buildings of Townscape Merit (BTM) are not of sufficient interest to warrant statutory protection as a listed building, but are still valued locally and LBRuT seeks to preserve and enhance such buildings across the borough. As such, proposals for the alteration, extension or expansion of such buildings will need to ensure that the particular characteristics and features of the building are preserved. Unsympathetic windows, doors and materials for example will be resisted, and there is a presumption against demolition of such buildings across the borough.

Conservation Areas

- 4.40 This SPD identifies the various Conservation Areas (CA's) across the borough, and notes that these areas are unique in terms of social cultural and aesthetic history of the borough and therefore must be safeguarded. While particular buildings are further protected as Listed Buildings or as local BTMs, the conservation areas seek to protect the wider surroundings and general environment, or the setting, of these buildings. There is a general presumption against demolition in CA's, and proposals for alterations and additions must consider the local context and setting.

Design Quality

- 4.41 This SPD is now somewhat out of date, but still a material planning consideration. The policy seeks to ensure that proposals are of a high standard and quality of urban design; and in particular consider – character; continuity and enclosure; public realm; ease of movement; legibility; adaptability and diversity.

Development Control for Noise Generating and Noise Sensitive Development

- 4.42 This SPD has been prepared in conjunction with LB Hillingdon and LB Hounslow and addresses noise issues - particularly in respect of Heathrow airport. The SPD notes that proposals (inc. change of use) will be considered in the context of surrounding development and compatibility with existing activities. Where a proposal is considered suitable in principle, appropriate acoustic design will be required to ensure appropriate standards are met to provide a good standard of amenity.

Planning Obligations

- 4.43 The Planning Obligation SPD sets out the circumstance where the Council may seek to secure S106 planning obligation in conjunction with the borough CIL. Such obligations will be sought on a site-by-site basis to mitigate the impact of development and/or ensure appropriate additional facilities are provided as part of the proposals. Areas for contribution potentially relevant to a town centre site such as this include: site specific transport requirements; public realm; heritage assets; sustainable design and construction; carbon offsetting and so on.

Refuse and Recycling Storage Requirements

- 4.44 Provides specific details on the minimum requirements for refuse and recycling storage including flat development. While off-street collection is preferred, and a separate commercial and residential waste facility required; exception to these requirements may be made where changes to a building will result in unacceptable structural and visual alterations to a building.

Residential Development Standards

- 4.45 LBRuT provides this SPD as a guide to development and notes that not all the standards are appropriate to all sites – for example listed buildings or BTMs'. Notwithstanding the policy seeks to strike a balance between ensuring residential development is of a high standard and provides appropriate amenity levels to both existing residents as well as future occupiers. As such, key considerations for all proposals are sunlight/daylight, sense of enclosure to neighbouring residents, and privacy / overlooking. Amenity space should be provided to the required standard where possible. Internal space standards are also set out in the SPD, however where these standards cannot be met, a suitable internal layout should be shown to demonstrate the functionality of the rooms. Conversions / subdivisions of historic buildings should not result in cramped or awkward layouts that may be considered over-development of the site, and should also consider the original internal floor plan. Access to flats in a converted building should ideally be from the original main entrance. Other design considerations include lifetime homes, refuse, parking, landscaping, sustainable design; however all of these must be considered with in the context and constraints of the site and in particular heritage assets.

Richmond and Richmond Hill Village Planning Guidance

- 4.46 The SPD seeks to establish the 'vision and planning policy aims for, and assist in defining, maintain and enhancing the character of Richmond'. The document seeks to identify features and important aspects that contribute to the local character of each of the village areas and is based on a character assessment of the various CA's. Relevant to this site are areas 14 and in particular 15. Area 15 is noted as the main commercial shopping area of the borough and presents a variety of high quality individual buildings. The area is separated into three distinct areas from the river, along George Street, and up to the station. Threats to the area include development that harms the traditional architectural features of a buildings or include unsympathetic alterations, loss of original shopfront and/or unsympathetic alterations including installation of solid steel shutters to shopfronts. The SPD seeks to preserve and enhance the architectural quality of the wider area in terms of building alterations, the public realm and shopfronts.

Small to medium housing sites

- 4.47 The purpose of this SPD is to further emphasis the importance of high standards of design when considering planning applications and for applicants to understand the aspirations of the Council. It primarily relates to infill and backland development is should be read in conjunction with the Design

Quality SPD. Key considerations for such development though include understanding the character and context of an area in terms of streetscene, building line, materials and so on.

Sustainable Construction Checklist

- 4.48 A construction checklist is required for all new proposals of 1 or more dwellings and over 100sqm of new floor area. This should outline compliance with policy as well as local targets to implement appropriate sustainable building methods early in a project, where possible. For proposals that result in one or more residential units (inc. conversions) the requirement is for 35% CO2 reduction, energy statement, meeting national water standards (110L/s) and completion of the sustainable construction checklist. It is recognised that the checklist may not be applicable to all development types and not all measures included will be appropriate for all types of development. While this will be taken into account, a low score must still be accounted for in the comments.

5. PLANNING CONSIDERATIONS

- 5.1 This section of the report seeks to address the key planning issues arising from the proposal. These issues have been identified through the pre-application discussion with Council officers, and a review of the relevant planning policy for the Site.

Principle of Development

- 5.2 The proposals seek to convert the vacant upper floors of the building to 8 no. residential units. It is well documented that the traditional high street is struggling in terms of viability, and the current pandemic has only exacerbated these pressures. Combined with a pressing need for suitable housing across the borough and indeed all of London, the conversion of the upper floors to residential accommodation is considered appropriate.
- 5.3 Notwithstanding, it is understood that this is a town centre location on a primary street frontage; and therefore the proposal will retain the existing ground and basement level retail use. Internal building alterations are required to provide dedicated residential access to the upper floors, and as a result, the proposal will also improve the internal access between the ground and basement levels. The basement is currently under-utilised due to the poor access via the existing fire stairs. As a result of these stairs being dedicated for residential access, internal alterations to the ground floor retail unit will restore a historic access and facilitate full occupation of the basement level.
- 5.4 Therefore the proposed change of use to the upper floors will retain the existing large-footplate ground floor retail offer in prominent part of Richmond high street, and enable the more efficient occupation of the basement. This more efficient use of the prime commercial space will support the continued vitality of the area. In addition, the proposals will also provide new residential units in the town centre that will also support the continued vitality and viability of the town centre and meet the growing need for housing.
- 5.5 This is entirely consistent with national planning policy that seeks to make effective use of land (para 117 & 188 NPPF), and is also in line with local policies (LP25 and LP26) that aim to preserve the town centre retail function, whilst recognising that residential, car free development is appropriate in some situations and can help to meet the local housing need (LP34). As such, the principle of the proposal is considered appropriate; and indeed this view is supported previous pre-application advice from the LPA.

Heritage

- 5.6 The Site is partly located within two Conservation Areas within Richmond Town Centre – ‘Richmond Green’ and ‘Richmond Central’, and is a Building of Townscape Merit. Therefore, heritage is a key

consideration when converting such a building. Due consideration has been given to these designations and the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990. Section 66 (1) of the Act establishes a general duty for a planning authority in considering whether to grant consent for a development which affects a listed building or the setting of a listed building. Relevant to this site, Section 71 (1) of the Act establishes a duty in the exercise of any function under the Act, to pay special attention to the desirability of preserving or enhancing the character or appearance of a conservation area. A conservation area is an area of local interest designated principally by the Local Planning Authority.

5.7 A Heritage Statement is submitted with this application that provides detail on the historic context of the surrounding area and the application Site. The statement assesses the impact of the proposals on the buildings and potential harm this may have on the building, Conservation Area and other historic assets in the vicinity.

5.8 As already noted in this statement and the submitted Viability Assessment, the continued use of the whole building for commercial purposes is no longer a viable option. Conversion of the upper floors is essential to ensuring the retention and continued use of this BTM within Richmond town centre. However conversion of the building requires changes to the rear of the building to regularise the internal floorplate and make a full and efficient use of the space; as well as providing new windows to create quality living space for residents, along with residential access doors from the existing fire exit in Brewers Lane. Importantly, the changes to the building will not affect the character or appearance of the building within the setting of the wider Conservation Areas. Specifically, the rear of the building is within the 'Richmond Green' conservation area, and the proposed alterations will not affect the special character of Richmond Green or the buildings that surround it.

5.9 In the context of the conversion of a commercial space with a large footprint, into residential space, the changes to the building are modest and focus mostly on the irregular form of the rear elevation and its' relationship with the adjoining premises. As such, the changes are entirely appropriate to the BTM and respect the setting of this building within the town centre. The proposed changes are sympathetic to the building; and as demonstrated by the Heritage Statement, the proposals will not affect the character of appearance of the building, or its setting within the Conservation Areas.

Design

5.10 The following design issues are considered key considerations relevant to this particular Site and proposals.

Unit Mix

5.11 As noted previously in Tables 2 and 3, the proposal is for eight new residential dwellings providing a mix of studio, 1 bed and 2 bed dwellings. While this does not include family dwellings, this unit mix

is considered entirely acceptable in a town centre location and is in accordance with the principles in national and local planning policy (LP25, LP35), and was also accepted in principle in pre-application advice.

Unit Layout

- 5.12 Pre-application advice was sought by the previous owner of the site in respect of the conversion of the upper floors of the building. This provided four new dwellings over the two upper floor levels, however as part of the pre-application response, the layout of the proposal was queried as being inefficient and whether an alternative design might increase the yield for the Site.
- 5.13 The internal layout of the building has been carefully considered in the context of the existing constraints of the building, such as the large floor plate, change in levels across the building, the historic internal layout and circulation areas, and previously blocked up windows. By taking full advantage of these features in the existing building fabric, the design has been increased from the four units in the early design for which pre-application advice was sought, to the eight units in the current proposal. This layout has been further refined following the design changes from the previously withdrawn application.
- 5.14 In terms of size, all the proposed units meet, and in a number of cases exceed, the minimum nationally described space standards for new units – despite the constraints of the Site. The proposed units provide ample open plan living areas with high ceilings, that exceed local space standards of 22sqm minimum; and all bedrooms exceed the minimum local standard of 12sqm with the exception of two rooms that are slightly less at just over 11sqm. All units include ample storage space.
- 5.15 Despite the constraints of the site, the proposal has successfully maximised the unit numbers on this town centre site and will provide eight large new units in the town centre that meet national and local space standards; and is therefore in accordance with local policy (LP 25) and national standards.

Materials

- 5.16 As already outlined, some external alterations are required to convert the building to residential use and make the most efficient use of the space including alterations to the building and new windows. These works will use high quality materials to match the existing materials (as noted on the submitted drawings and DAS). It is also noted that a variety of materials are already in use across the building such as painted render to the front (although there are no proposals to alter this part of the building) and brickwork to the rear. There is also variation in the style of fenestrations across the site. As noted in the Heritage Statement however, the new windows will be timber sash to match the style of the George Street elevation that was the original building on the site and for residential use. It has only been since the buildings conversion as a shoe shop and retail premises that the metal crittal windows were installed, as shown by the various windows that have been blocked up.

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- 5.17 Overall the materials proposed will be consistent with the existing, and original, materials and construction of the building; and will not appear incongruous to the overall structure. The proposals will not have a detrimental impact on the BTM, or be harmful to the wider Conservation Areas, and are consistent with local policies (LP1, LP3, LP4 and LP26).

Amenity considerations

Amenity space

- 5.18 The Site is a town centre location with Richmond Green just 50 metres to the north-west of the Site. Given the buildings status as a BTM and the Site constraints, there is limited opportunity to provide external amenity space. However the units are generally well above minimum national space standards and given the location and Site context, the lack of external amenity space is considered acceptable, and was agreed in principle in the original pre-application advice.
- 5.19 Notwithstanding, as part of the redesign following the withdrawal of the previous application, several small winter gardens have been created on the rear elevation. These have been introduced primarily to minimise overlooking between the residential units and adjoining terrace beer garden, but have the added benefit of providing some amenity space to a four units.

Overlooking

- 5.20 In terms of privacy and overlooking, the Site is in a town centre location with buildings immediately adjoining to the north and west; and across 'Brewers Lane' pedestrian walkway. Windows at the upper levels on the neighbouring building across Brewers Lane, have been blocked and it is understood that they are commercial premises and not residential dwellings. Given the lane separating the two buildings, there will potentially be some limited overlooking at the first floor level across Brewers Lane. However as shown in Dwg No. GSR/PL/204, the outlook from these rooms is across, rather than into, the neighbouring commercial space.
- 5.21 To the rear, concerns were raised regarding the previous design and over-looking from the terrace beer garden to/from the new residential dwellings. To address this issue, winter gardens have been created that setback the main building line and, in addition to a low parapet wall on the boundary, there will be limited opportunity for overlooking and unacceptable levels of harm are thereby avoided.
- 5.22 The distance to dwellings to the north-east of the Site, and that front The Green, varies but is approximately 24 – 25 metres. This is above the recommended minimum of 20metres in local planning policy although the policy does recognise that in some instances, it may be appropriate to further reduce that separation distance.

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- 5.23 Concerns were also raised regarding the proximity to a window at the rear of No. 3 Brewers Lane. This window serves the back-of-house area of the retail premises and there is no residential use at this level. The view is also oblique and not directly facing. Notwithstanding, a winter garden has also been created to Units 1 and 8 to provide some visual separation and minimise overlooking when in these rooms.
- 5.24 Overall, the proposal have been amended to address this issue in the previous application, and now provide a good level of amenity and privacy to residents; and to a level that is considered entirely acceptable in, and typical of, a dense town centre location such as this.

Noise

- 5.25 Concerns were raised in the previous application with respect to the noise of patrons in the pub, and in particular the impact of the elevated terrace disturbing new residents. A Noise Impact Assessment was undertaken following the withdrawal of the previous application, and is submitted with this application. Allowances have been made give the current lockdown, and this approach was agreed with LBRuT prior to undertaking the survey work.
- 5.26 The report concludes that without mitigation, there is likely to be an impact on the new residents. The report provides details of the Acoustic glazing and trickle vents required to all new windows in order to ensure that an appropriate level of amenity is maintained for residents.
- 5.27 In addition to this, the winter gardens are expected to provide an additional buffer and the external windows can be open, or closed to provide an additional level of mitigation if needed. The applicant also understands that the use of the terrace and beer garden is subject to licensing regulations that restrict the times that the area can remain open. We also draw attention to the fact that the site is within a Town Centre, and the proximity to the pub is clearly evident; and therefore some noise and disturbance is to be expected when choosing to live in a Town Centre location, and indeed is often desirable to those that choose to live there.
- 5.28 Therefore, with appropriate mitigation, the units will provide an appropriate level of amenity for a Town Centre location such as this.

Sunlight/Daylight

- 5.29 As part of the amendments to the proposal, including the provision of the winter gardens, a Sunlight / Daylight Assessment has been undertaken to ensure that there is an appropriate level of sunlight/daylight. To address amenity considerations, further detailed analysis has been undertaken and design changes have been made such as the removal of the unused chimney on the north-west elevation and installation of larger windows. This change to the design significantly improved the

sunlight/daylight to these spaces. The only exception is the living space of Flat 8. As outlined in the Sunlight/Daylight Assessment, this room is slightly below standard for sunlight due to the outlook and inset balcony. However, it meets BRE guidelines for daylight and this Flat is dual aspect with the rest of the habitable rooms oriented to the south. Therefore Flat 8 as a whole, has a good level of amenity.

- 5.30 Overall, the proposal will ensure that residents have an acceptable level of sunlight and daylight, commensurate with the built-up urban area and constraints of converting an existing building.

Summary

- 5.31 Overall the proposal will ensure a good standard of amenity for future residential occupiers in this Town Centre location with generous sizes units with some amenity space; together with meeting daylight and sunlight, noise and privacy considerations. The proposal is consistent with the principles for residential amenity within national and local planning policy (LP8, LP10).

Other considerations

Affordable Housing

- 5.32 The applicant notes the Affordable Housing policies LP36 and relevant SPD, and the requirement for a contribution to affordable housing for all sites within Richmond. However, as set-out in the Viability Assessment, the conversion of this retail space is required to secure the long-term viability of the building in the context of a particularly challenging retail sector. For the reasons set out in the Viability Assessment, no affordable housing contribution is proposed at this time. The applicant will enter into discussions with the LPA and their viability consultant on this matter; and enter into a legal agreement as needed. Therefore, the proposal will comply with local planning policy (LP36).

Sustainability considerations

- 5.33 The conversion of any building for residential use is inherently challenging, however in this particular case, the design is further limited by the building's heritage designations. Submitted with the application is a Sustainability checklist completed as far as possible given the proposals. A BREEAM pre-assessment has also been conducted and is submitted with this application. This concludes that with the implementation of various measures such as responsible construction measures, considered material specification, reducing predicted water consumption of 118L/day, waste and so on; that the proposals can achieve a target of BREEAM 'Excellent'.

Transport

Vehicle Parking

- 5.34 A Transport Statement has been submitted with this application. The proposal will be car-free development, and given the town centre location of the Site and PTAL level of 6b, this is considered entirely appropriate and is consistent with local and regional planning policy.

Cycle Parking

- 5.35 Cycle parking for 14 cycles is proposed in the basement level for residents, and accessed via a 'cycle gutter' down the existing stairs. The basement location provides a large area that enables cycle parking in excess of the minimum standard requirement for 12 spaces, and also provides locker space for residents to securely store additional equipment. Locating the cycle store in the basement also maximises the ground floor retail area. Overall the provision of and encourages sustainable transport options.

Servicing

- 5.36 Deliveries to the new residential units are expected to be shared with deliveries to other premises in the town centre and therefore the proposal will not have a detrimental impact on the highway network. Servicing to the commercial premises will remain unchanged by the proposal, with deliveries continuing from George Street into the ground floor. The frequency of deliveries is expected to reduce, in line with the reduction in retail floor space, thus further reducing any potential impact on the highways network from the proposed conversion of the first and second floors. Overall deliveries and servicing the proposal are not expected to have a detrimental impact on the surrounding highways network.
- 5.37 Refuse will continue to be from George Street as part of the existing commercial street collection service. The refuse store will be access via a digi-lock system that enables the bins to be emptied as part of the current refuse arrangement.
- 5.38 In summary, the proposal meets, and in terms of cycle parking, exceed, local and regional planning policy requirements (LP44, LP45 and London Plan Policy 6.9).

6. CONCLUSION

- 6.1 This Planning Statement has been prepared to accompany a planning application for the conversion of the first and second floors of 54 George Street into eight residential dwellings, along with minor alterations to the building.
- 6.2 The building was formerly in retail use across all four floors, however increasing pressures and changes to shopping behaviour, together with the impact of the pandemic, have fundamentally altered the demand for large premises such as this. The clear intention of central government policy, is to not only support the economic recovery as a whole, but to also restore the vitality and life of town centres nationwide.
- 6.3 The proposals will retain the ground floor retail premises and improve the under-utilised basement to provide a more attractive retail premises for a new tenant and limit the time that the prominent high street premises remain vacant. The conversion of the upper floors into flats is entirely appropriate in a town centre location such as this with excellent access to services, high quality amenity space, and excellent public transport connections; and it will meet the continued demand for housing across the borough.
- 6.4 The design and layout, has been reviewed following the withdrawal of the previous application. The new design ensures that the residential units are still of a generous size and it makes good use of the existing building layout and constraints. The redesigned scheme provides amenity space to some units in the form of winter gardens; maintains a level of privacy to all residents that is appropriate in this dense urban area; and ensures an appropriate level of amenity for new residents in a town centre location in terms of noise mitigation and access to sunlight/daylight. The Site will be car-free and encourage sustainable transport use such a cycling and public transport; as well as incorporate sustainable building methods where appropriate into the existing building.
- 6.5 Although the design will require external alterations to the existing building, these are considered appropriate and have considered the historic context of the site. The proposals will not harm the significance of the building in the Conservation Areas, respect the importance of the building and its BTM designation, and are appropriate to the setting of the nearby listed buildings. The alterations to the Brewers Lane and north-west elevations in particular will facilitate the continued viable use of the building, and on balance are entirely appropriate interventions.
- 6.6 The proposal therefore strikes a balanced approach between the provision of housing in a highly sustainable town centre location; and the retention of high quality ground floor retail space within the high street; while also respecting the historic context of the site. Overall the conversion of the upper floors to residential, and alterations to the building to enables this, will support the continued vitality

and viability of the Richmond town centre. We therefore consider the proposal acceptable in terms of national and local planning policy, and that planning permission should be granted.