



**GERALDEVE**

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**Our ref:** GAO/JOR/EMOU/U0016520

**Your ref:** PP-09817515 (via planning portal only)

Dear Sir / Madam

**The Morelands and Riverdale Buildings, Lower Sunbury Road, Hampton TW12 2ER  
Town and Country Planning Act 1990 (as amended)  
Planning (Listed Buildings and Conservation Areas) Act 1990  
Application for Full Planning Permission and Listed Building Consent**

We write on behalf of our client, Touchlight Holdings Ltd to enclose an application for full planning permission and listed building consent in relation to The Morelands and Riverdale Buildings ('the Site').

Planning permission and listed building consent is sought for the following:

*"Internal and external works to the Morelands Arcades including the provision of a fire escape and a new entrance door, the provision of an external plant enclosure to the rear of the Morelands Arcades and the provision of an electricity substation with associated works"*

This proposal and the content of this application have been the subject of pre-application discussions with officers at the London Borough of Richmond Upon Thames ('LB Richmond').

### **Background**

The Morelands and Riverdale Buildings are home to Touchlight Genetics. The overriding objective of the development is to provide additional laboratory facilities for Touchlight which will assist them in their work in the development of vaccinations related to the COVID pandemic. Touchlight are currently involved in 5 separate programmes related to either the prevention or cure of COVID and are currently in discussion with Government at a high level to help facilitate their progress.

The sub-station, plant enclosure and scheme of proposed works are critical to the operation of the facility and its ongoing role in the vaccine delivery. There are therefore significant public benefits arising from the proposals and it is critical that this infrastructure is delivered quickly to assist the Government's response to the pandemic.

### **The Site**

The Site comprises a 0.9 hectare parcel of land bound by Upper Sunbury Road to the north, Lower Sunbury Road to the west and Thames Water filter beds to the south. The majority of the site comprises

the Moorlands and Riverdale Buildings with a road and hardstanding to the south, and a wide grass verge to the north. The Site is accessed at its western end from Lower Sunbury Road.

Both the Moorlands and Riverdale Buildings are Grade II Listed as are the cast railing along the northern boundary. Additionally, the Site is located within the Hampton Village Conservation Area.

The Listing Description for each building is provided below:

Morelands:

*'2. 1867-70. Engineer Joseph Quick, extended and completed 1885-6 by Engineer JW, later Sir James Restler for the Southwark and Vauxhall Water Company. Gault brick. Centre part of one storey with 2-storey end blocks. The centre range being a series of blind arches with broad segmental heads, this range being 15 bays long. Projecting end blocks with arcaded ground floor and segmental windows above basement with cornice runs the full length of the building. Windows have moulded surrounds and cast-iron honey-comb patterned glazing bars. Stand-pipe tower demolished in 1970.'*

Riverdale:

*'2. 1898-1900. Comprises 2 connected wings: a. The engine house immediately fronting Upper Sunbury Road having a symmetrically arranged facade of 5 bays: the outer bays are advanced with full-height, triple light, round headed windows and are covered by slated mansard roofs with fishscale tiles, each with a dormer set into the face of the parapet brickwork: the second and fourth bays each have a pair of round headed windows full height and are surmounted by stone parapet balustrading: the central bay is advanced, having a triple light round-headed window beneath which is the entrance porch with a balustraded balcony. In the parapet is set the barge of the Southwark and Vauxhall Water Company in stone. Entrance gate and iron railings. b. Set behind and to the right of the Engine House. A long building of "nave and aisle" form having an arcaded ground floor with a slated lean-to roof rising to a clerestory lighting the central area and which has a slated pitched roof.'*

## Planning History

We have reviewed the online planning history records for the building. Decisions of relevance to this application are summarised below.

- On 14<sup>th</sup> November 2013, listed building consent (**13/2101/LBC**) was granted for the restoration, refurbishment and alterations to listed buildings in connection with Class B1 development, car park and servicing, ancillary cafeteria and staff facilities, landscaping and electricity substation.
- On 14<sup>th</sup> May 2014, planning permission (**13/2047/FUL**) was granted for the restoration and refurbishment of the listed buildings to create Class B1 accommodation a car park and servicing, ancillary cafeteria and staff facilities, landscaping, electricity substation and replacement security building.
- On 4<sup>th</sup> September 2018, listed building consent (**18/2319/LBC**) was granted for the restoration, refurbishment and alterations to the listed buildings in connection with B1 development, car park and servicing, ancillary cafeteria and staff facilities, landscaping and electricity substation.

- On 12th September 2018, listed building consent (**18/2429/LBC**) was granted for the restoration, refurbishment and alterations to listed buildings in connection with B1 development, car park and servicing, ancillary cafeteria and staff facilities, landscaping and electricity substation.
- On 10th September 2018, planning permission (**18/2442/VRC**) was granted for the variation of condition U66660 (Approved Drawings) of Planning Permission 13/2047/FUL.

### **Pre-application Engagement**

The proposals which form part of this submission were subject to pre-application discussions which encompassed wider amendments to the scheme (to be brought forward through a separate application in the near future). Following a pre-application meeting with officers, written pre-application feedback was received on 19<sup>th</sup> October 2020. Written feedback concluded support for the principle of the proposals (i.e improvement of the premises to facilitate the laboratory use).

In addition to formal pre-application engagement, the proposals have been subject to discussions with Murina Wilson MP.

### **Development Proposal**

The application is supported by a Design and Access Statement which details the proposals in full and a summary is provided below.

#### Morelands Arcades

- The introduction of a louvred external plant enclosure to the rear of the Morelands Arcades with associated service penetrations;
- The provision of a double door entrance to the Morelands Arcades and new entrance to the Beam House;
- The incorporation of builders works openings and 2 doors through the existing walls from the new plant area to the Morelands Buildings and a new fire escape staircase; and
- Internal alterations to the ground and first floor layout of the Morelands Building.

#### Site Wide

- The introduction of an electricity substation to the north-east of the site to serve the laboratory use

### **Planning Policy Context**

#### National Planning Policy Framework

The National Planning Policy Framework (2019) ('NPPF') is a material consideration in the determination of planning applications. It sets out the government's overarching planning policies for England and how they are to be applied.

#### Development Framework

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the statutory Development Plan unless material considerations indicate otherwise. The adopted Statutory Development Plan for the purpose of this application comprises:

- The London Plan (2021); and
- Richmond Local Plan (2018)

LB Richmond and the GLA have also published guidance on a range of topics relevant to the interpretation and application of each respective Plan - these are a material consideration to the determination of the application.

#### Emerging Development Plan

The London Borough of Richmond upon Thames are in the process of preparing a new local plan. The document is in the early stages of engagement – the direction of travel consultation took place in spring 2020 and adoption is scheduled for 2024. By virtue of comprising no draft policy, the emerging policy context does not form part of the planning assessment.

#### Key Legislation

Sections 66 and 72 of the Planning (Listed Building and Conservation Areas) Act 1990 require authorities to pay special regard to the setting of listed buildings and the character and appearance of conservation areas in the exercise of all planning functions.

### **Planning Policy Considerations**

#### Heritage

Paragraph 192 of the NPPF is clear that local authorities, in determining planning applications, should take account of (a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; (b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and (c) the desirability of new development making a positive contribution to local character and distinctiveness.

The NPPF at Paragraph 193 is clear that: “when considering the impact of a proposed development on the significance of a designated heritage asset, 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.”

Policy HC1 of the London Plan states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets’ significance and taking their surroundings into account.

Policy LP3 of the Local Plan sets out 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. With regard to conservation areas, the policy requires development to preserve and where possible enhance the character and appearance of the Conservation Area. With regard to listed buildings, the policy requires the retention and preservation of original structure, layout, architectural features, materials as well as later features of interest.

#### Heritage Assessment

Given the property's Grade II Listing and the location of the application site within a designated Conservation Area, it is necessary to pay special attention to the desirability of preserving or enhancing the character of the building and appearance of the area as required by Section 72 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 also requires when considering if to grant planning permission for development which affects a Listed Building or its setting, the decision maker shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

LB Richmond has a statutory duty to preserve or enhance the character of the listed building and appearance of the Covent Garden Conservation Area (which is considered a Heritage Asset by reference to the National Planning Policy Framework (NPPF).

In line with the NPPF and development the proposed alterations have been designed to the highest architectural standards as the applicant seek to conserve and, where possible, enhance the existing fabric of the building. The materials proposed will ensure that they fully complement the existing building and the historical setting of the surrounding Conservation Area.

The proposed works involve the minimum amount of intervention necessary to achieve the optimum result with the aim of enhancing the property's long-term viable use. The proposals will not alter the elements of the building which provide its special quality and will not affect the significance of the listed building or the character and appearance of the conservation area.

As such, the proposals will enhance the offering of the Riverdale and Morelands buildings by delivering a high quality scheme which reflects the significance of the buildings and provides a long term viable use which in turn enables investment within their fabric. Ultimately the proposals are minor in nature and serve to upgrade and refurbish the appearance of the building and the wider conservation area.

It is therefore considered that the proposed works are acceptable in heritage terms, meeting the relevant statutory tests and fully according with the NPPF, Policy HC1 of the London Plan and Policy LP3 of the Local Plan.

#### Amenity

Local Plan policy LP10 sets out that the Council will seek to ensure that local environmental impacts (including noise) of all development does not lead to detrimental effects on the health safety and amenity of existing and new users or occupiers.

#### Amenity Assessment

The nearest residential properties to the Site are circa 30m from the north façade of the Morelands building along Upper Sunbury Road. The application is supported by an acoustic assessment which identifies an appropriate noise criterion in conformance with the relevant policy context and best practice industry guidance. This will ensure that future plant machinery to be capable of meeting the Council's policies for noise and vibration. The proposal is therefore considered to be acceptable in amenity terms.

#### **Documentation**

In addition to this Planning and Heritage Assessment, the following documentation is submitted in support of this application:

- Completed Planning Application and CIL Forms;
- Site Location Plan;
- Environmental Noise Report as prepared by Paragon Acoustic Consultants Ltd;
- Design and Access Statement as prepared by Chapman Architects;
- Drawings Package including Heritage Assessment as prepared by Chapman Architects; and
- The correct application fee of £2028 has been paid online.

*Note on CIL: By virtue of representing a building people go only intermittently for the purpose of inspecting or maintaining fixed plant or machinery, the element of proposed development leading to an uplift in floorspace is not liable for CIL in accordance with The Community Infrastructure Levy Regulations 2010 (as amended). The application is supported by a completed CIL Additional Application Form which therefore denotes that the application will not result in any chargeable floorspace.*

We trust the above is self-explanatory and await confirmation of the applications being made valid. In the interim however, should you have any questions please contact Emma Mounsey (07557315779) or Joanne Rams (02073336372) of this office. In due course, we welcome the opportunity to undergo a site-visit with officers.

Yours faithfully



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Enc. As above