



Morelands & Riverdale Buildings
Lower Sunbury Road, Hampton, TW12 2ER

on behalf of

Touchlight Holdings Ltd.

1st July 2021

CA

Introduction & Background

This document has been prepared by the Design Team engaged by Touchlight Limited in response to the latest discussions held with Richmond Borough Council with regards the proposed development located at the Morelands and Riverdale buildings located on the Lower Sunbury Road.

In particular this document looks to address concerns raised with regards the height of the enclosure proposed to run parallel to the Upper Sunbury Road that will screen the new plant and equipment necessary facilitate the development.

In June 2020 the team submitted a Pre Application proposal that incorporated a metal screen which was 3.25 meters above the prevailing ground level constructed. This proposal was generally well received by Richmond Borough Council and a copy of the Pre Application response is included in the Appendices for reference.

Following this initial advice a planning application for critically important elements of the project, was submitted in early June 2021. In this application the screen had increased in height by 550mm. At our most recent Pre Application meeting with the Council on the 17th June, it was apparent that the height and materiality of the screen presented an issue for officers. To that end the Team have looked into ways in which the height of the screen can be reduced and alternative methods of construction that will be more sympathetic to the Listed Building.

In addition to the height of the screen the Team have also set out the essential need for the plant to be sited in the proposed location to service the laboratories.



Pre-app July 2020



Planning Submission June 2021



New Proposal

Pre-app June 2021:
Presented to RBC on 18th June 2021

Pre-app July 2020:
Agreed by RBC on 27th July 2020

New Proposal:
New proposal in line with agreed scheme from July 2020

1. Morelands Plant Zone

Pros

1. Location will require smaller number of connections through the Listed facade
2. Least disturbance to the Thames Water pipework
3. Sits neatly between the Engine House and Beam House, set back from the road,

Cons

1. Reduces visibility of Morelands Building

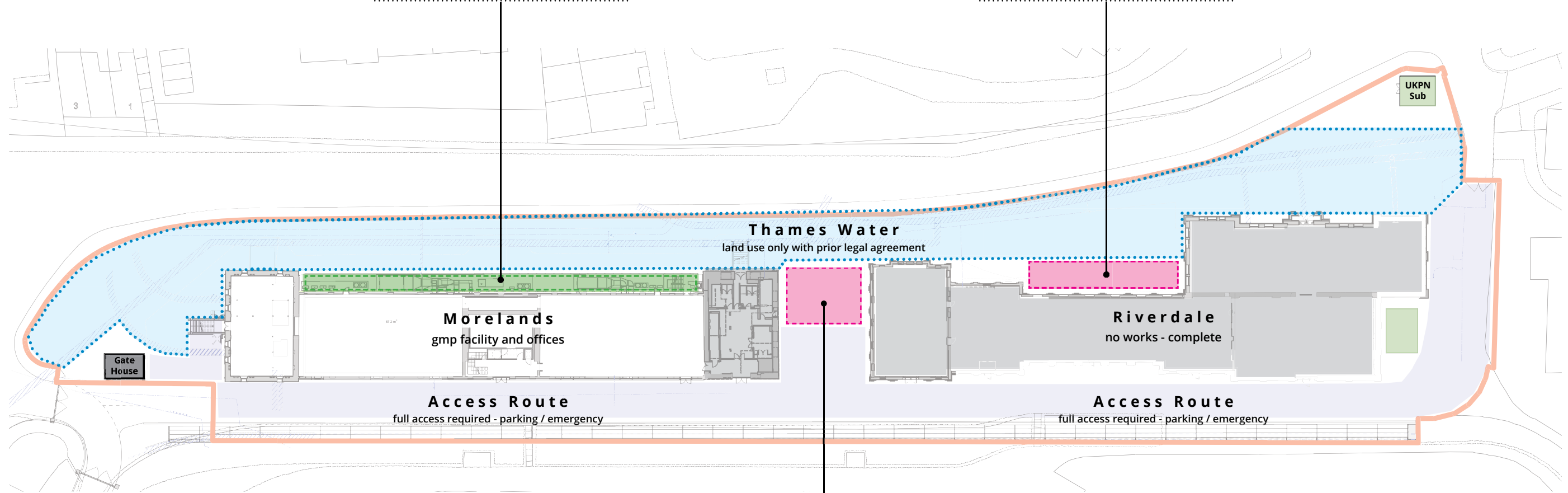
3. Riverdale Plant Zone

Pros

1. Set back from Upper Sunbury Road

Cons

1. Will require a large amount of complex connections into the listed buildings
2. Requires access over Thames Water land and excavations / disturbance of pipe work
3. Area not large enough for amount of required plant for the GMP facility



2. Central Plant Zone

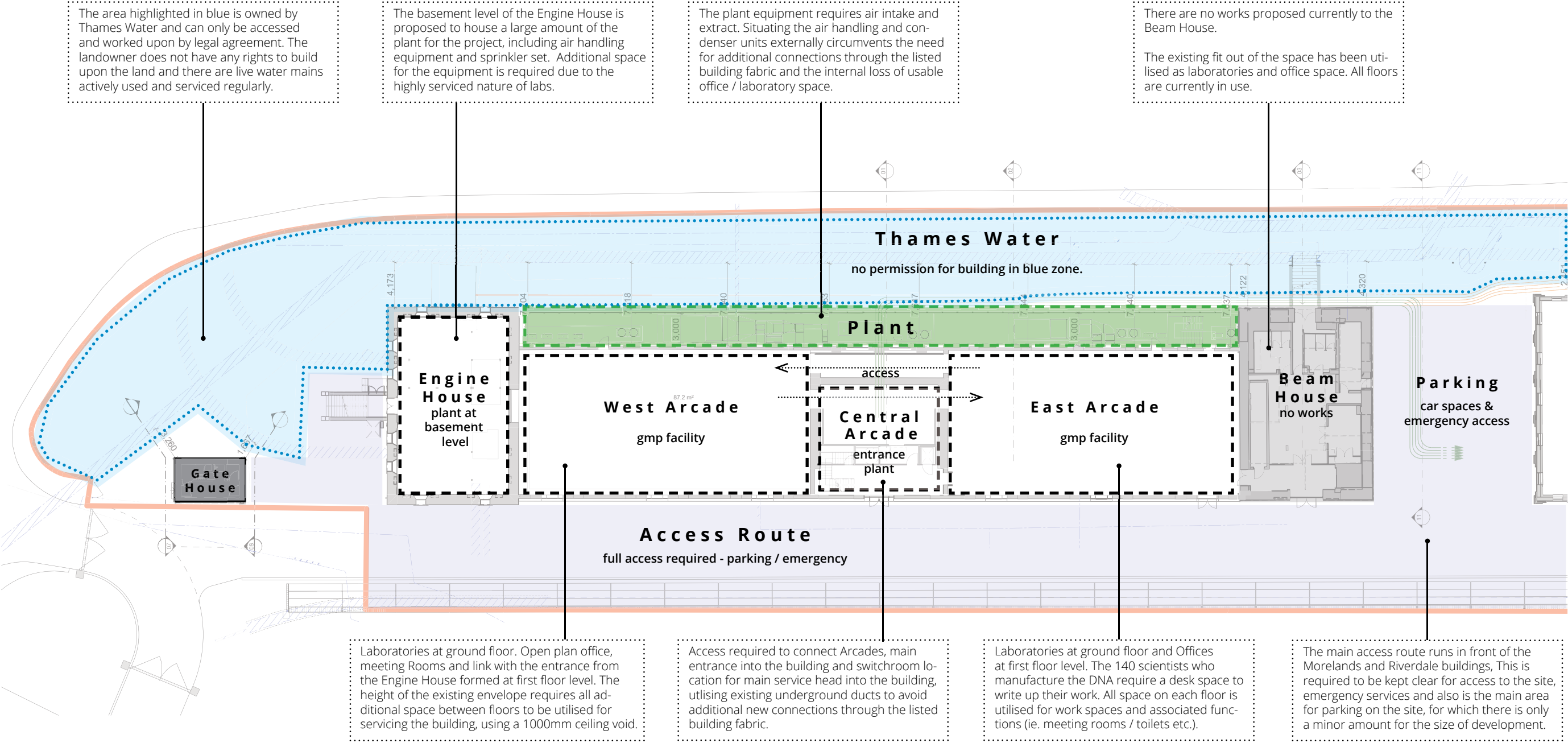
Pros

1. Set between the listed buildings
2. Set back from elevation and the road

Cons

1. Requires removal of approved car parking spaces. Spaces already limited on site.
2. Will require a large amount of complex connections into the listed building Requires access over Thames Water land and excavations / disturbance of pipe work
3. Access Route required for emergency services

Plant Location - Building Constraints



The area highlighted in blue is owned by Thames Water and can only be accessed and worked upon by legal agreement. The landowner does not have any rights to build upon the land and there are live water mains actively used and serviced regularly.

The basement level of the Engine House is proposed to house a large amount of the plant for the project, including air handling equipment and sprinkler set. Additional space for the equipment is required due to the highly serviced nature of labs.

The plant equipment requires air intake and extract. Situating the air handling and condenser units externally circumvents the need for additional connections through the listed building fabric and the internal loss of usable office / laboratory space.

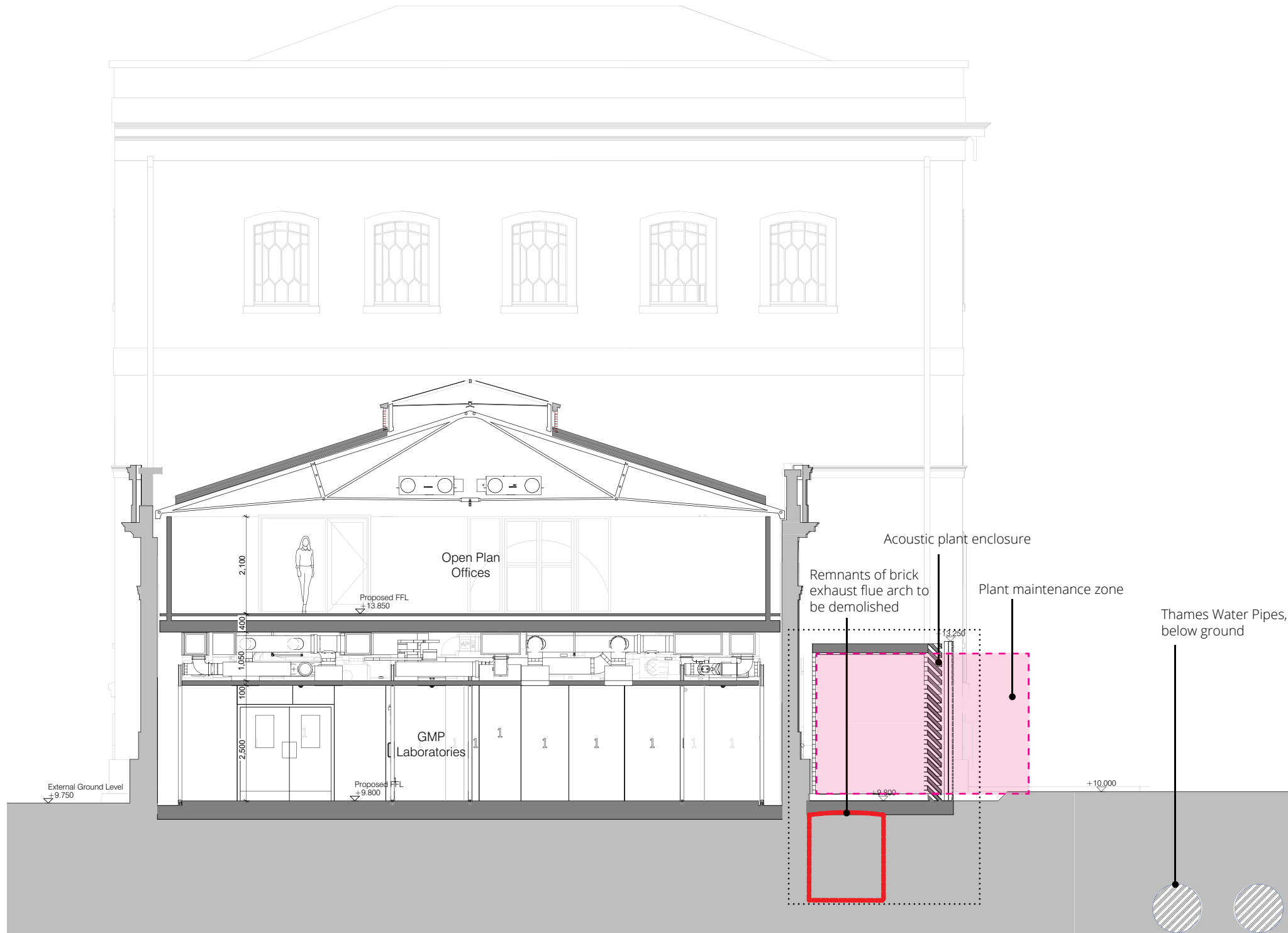
There are no works proposed currently to the Beam House.
The existing fit out of the space has been utilised as laboratories and office space. All floors are currently in use.

Laboratories at ground floor. Open plan office, meeting Rooms and link with the entrance from the Engine House formed at first floor level. The height of the existing envelope requires all additional space between floors to be utilised for servicing the building, using a 1000mm ceiling void.

Access required to connect Arcades, main entrance into the building and switchroom location for main service head into the building, utilising existing underground ducts to avoid additional new connections through the listed building fabric.

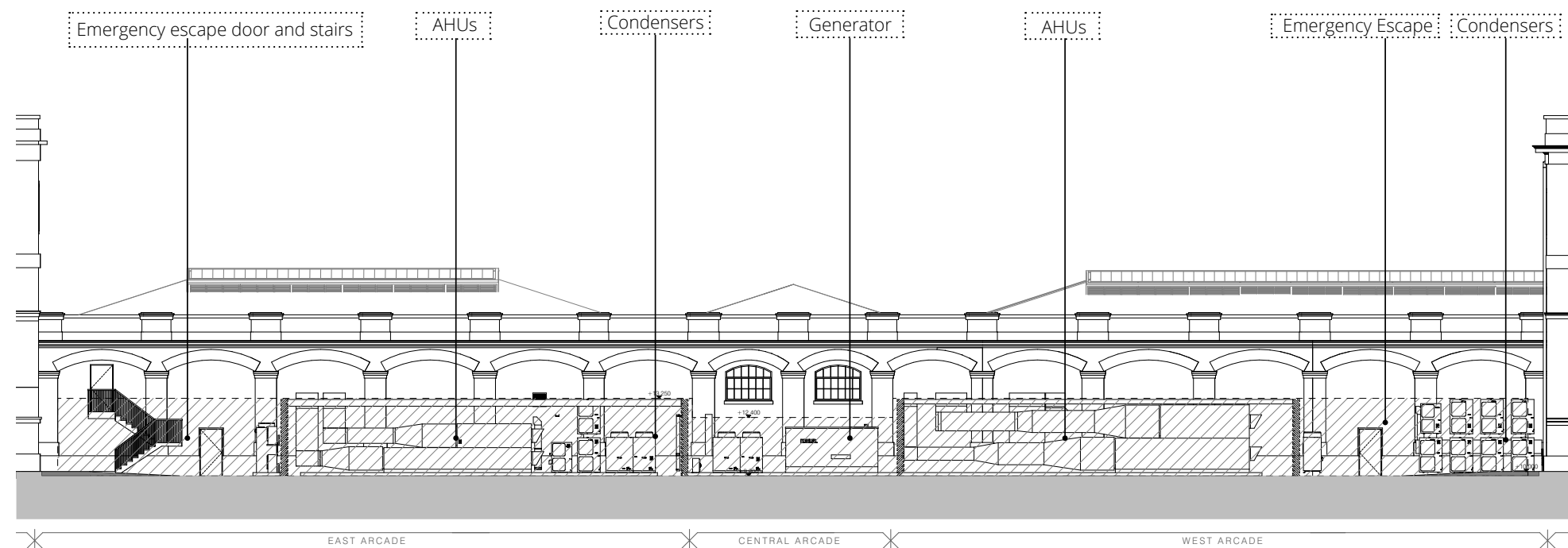
Laboratories at ground floor and Offices at first floor level. The 140 scientists who manufacture the DNA require a desk space to write up their work. All space on each floor is utilised for work spaces and associated functions (ie. meeting rooms / toilets etc.).

The main access route runs in front of the Morelands and Riverdale buildings, This is required to be kept clear for access to the site, emergency services and also is the main area for parking on the site, for which there is only a minor amount for the size of development.



The team have also investigated methods of reducing the ground level of the plant enclosure, however the need to provide level maintenance access to the equipment and restrictions imposed by Thames Water, mean that further excavation is not possible. As such the specification and detail of the plant proposed has been reviewed and as a consequence the plant enclosure can be reduced to what was originally proposed at the initial Pre Application submission

Plant Location - Proposed Equipment



Morelands Arcades Roof - East Arcade

The existing roof for all the Morelands buildings uses lightweight trusses and finishes and is to be retained.

In addition to the lightweight nature of the trusses, the profile of the roof is not suitable for locating plant; as shown in the section overleaf, it will be more visible from the road and would require a significant amount of additional structure support through the listed building.

The plant equipment requires air intake and extract, which if situated inside the building would require a larger number of penetrations and louvres in the walls and the roof. Situating the air handling and condenser units externally circumvents the need for additional connections through the listed building fabric.

Situating the plant internally would also require additional cooling and air exhausts, which would lead to higher energy consumption, as well as further penetrations into the building.

Further to the meeting on 17/06/2021, we have reviewed the plant equipment layout and made proposals to reduce and relocate items, so that they have the least impact on the existing building and, in order for the plant screen to be reduced in height.

Proposed Materials

Acoustic Louvres - to sit behind fencing



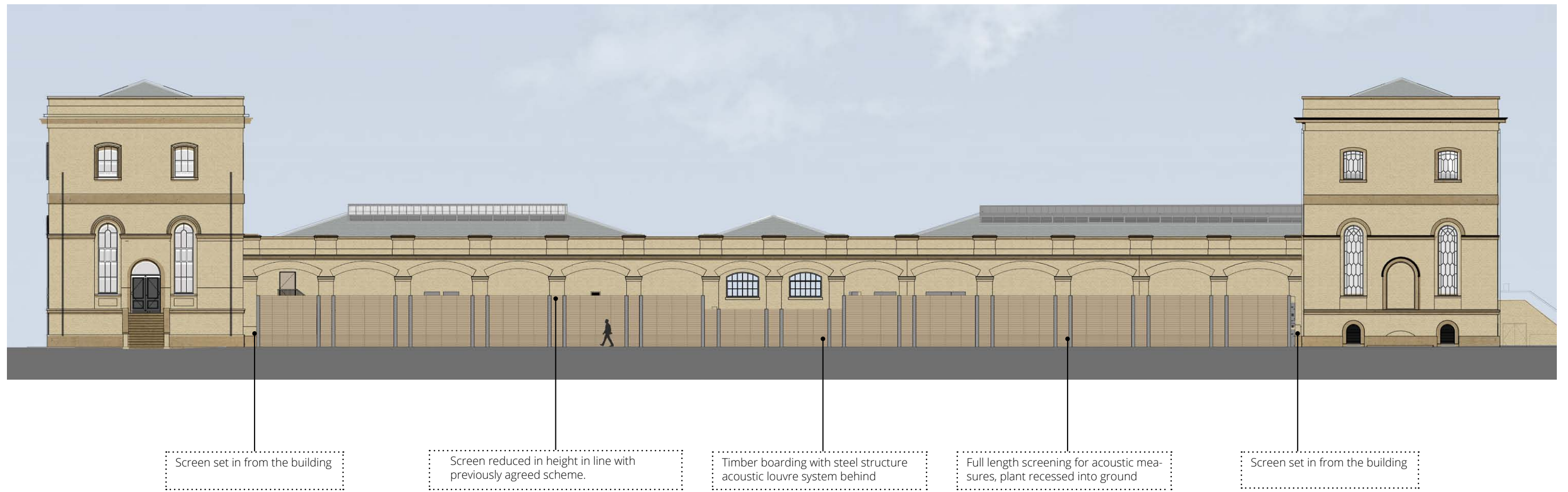
Timber Fence Screening

Since the Pre Application meeting on the 18th June 2021, a consultation with an acoustic specialist has revealed that the plant requires more extensive acoustic enclosures.

These acoustic enclosures will be made from subtle light grey acoustic louvres. The design of these galvanised steel louvres will be 'continuous line' to provide a more paired back aesthetic.

The acoustic enclosures now sit behind an elegant timber screen. This timber screen will be treated with a subtle wood coating that will be colour the wood to compliment the colour of the brickwork of the Morelands Building.

Timber Screening





Plant Screen as Submitted to RBC - June 2020



Plant Screen as Proposed - Timber Plant Screen

This document summarises the development of the plant location and the design development of the plant screen itself, following comments from RBC.

The Team have investigated options following the recent discussion with Richmond Borough Council and would surmise the amended proposals as follows;

Plant Location

The rear of Morelands Arcade is the only viable location for siting the plant for the laboratories. The plant equipment requires air intake and extract. Situating the air handling and condenser units externally circumvents the need for additional connections through the listed building fabric and the internal loss of usable office / laboratory space.

Also taking account of the restrictions imposed on the site, in particular those required by Thames Water to ensure a safe working environment for the active mains water supplies, we believe the only practical and practical solution is to locate the plant and equipment in a the narrow enclosure currently proposed running parallel to the Upper Sunbury Road

Plant Screen Design

The Team have investigated the feasibility of lowering the plant enclosure to be partially below the ground level and hence reduce the height of the screen itself. This has proved not possible due the proximity of the active water mains and Thames Water's requirement to avoid excavation in these areas that could damage these mains supplies themselves. Instead the team have revisited disposition and specification of the plant so that the screen now proposed is the same height as that first described at the initial Pre Application meeting in June 2020.

In addition the Team has also reviewed the construction and materiality of the screen itself. As such a timber screen is proposed that will weather with age and is believed to be more sympathetic to the Listed Building. This screen is also broken into bays that reflect the buildings rhythm.

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**Environment Directorate
Planning and Transport Division**

Civic Centre, 44 York Street, Twickenham TW1 3BZ
Tel: 020 8891 1411 - text phone 020 8891 7120
Fax: 020 8891 7789
Website: www.richmond.gov.uk/planning



Our ref: 20/P0168/PREAPP

Mr Greg Chapman
Chapman Architects
54-58 Tanner Street
London
SE1 3PH

Please contact: William Tysterman
Telephone: 0208 891 1411
e-mail:
william.tysterman@richmondandwandsworth.gov.uk

Date: 19th October 2020

By Email Only

Dear Mr Chapman

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)

Site: The Morelands and Riverdale Buildings, Lower Sunbury Road, Hampton

Proposal: Complete refurbishment and redevelopment of existing buildings

I write in reference to your pre-application advice request received by the Council 26th June 2020. Based on this information, I have the following comments to make:

Site Description

The site is located on the north bank of the River Thames in Hampton, to the south west of London in the borough of Richmond upon Thames. The Hampton Water works were formed in 1852. On the site, there were a series of filter beds beside the River Thames and three original pumping stations, for three different water companies, bordering Thames Street (now Upper Sunbury Road). Thames Water own and operate all the filter beds and the original pump houses at the Hampton waterworks, west of this site. The two remaining Grade II listed Victorian pumping stations, Morelands and Riverdale, were sold in 2012 to Blackbottle Ltd, the current site owners. The site is currently occupied by Touchlight Genetics.

As stated above, the buildings on site are Grade II listed buildings, and are within Hampton Village Conservation Area. The site is also within an Area of Archaeological priority, within Flood Zone 2 as designated by the Council's Strategic Flood Risk Assessment (SFRA) and the Thames Policy Area. The Green Belt and an area of Other Site of Nature Importance is immediately adjacent to the pre application site. There is also an Article 4 restricting works to basements.

Relevant Planning History

18/2442/VRC - Variation of condition U66660 Decision Details (approved drawings) of

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Planning Permission 13/2047/FUL. – Approved – 10/9/2018

18/2429/LBC - 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. – Approved 10/9/2018

18/2319/LBC - 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 – Approved 4/9/2018
15/5150/FUL - Insertion of 6 windows within existing arches on the north elevation. – Approved – 28/1/2016

15/5151/LBC - Insertion of 6 windows within existing arches on the north elevation. – Approved 28/1/2016

13/2047/FUL - Restoration and refurbishment of listed buildings to create B1 accommodation, car park and servicing, ancillary cafeteria and staff facilities, landscaping, electricity substation and replacement security building – Approved 14/5/2014

13/2101/LBC - 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 – Approved 13/11/2013

12/4079/LBC - Repairs and restoration of the building fabric. Cleaning of existing external/internal facades. Opening up and structural investigations of existing floor slabs – Approved 12/4/2013

12/2185/LBC - Demolition of later 20th century brick porch and steel shed structure from side of 19th century waterworks building. Demolition of fuel tank and bund wall beside 19th century waterworks building. Removal of later 20th century internal partition walls within 19th century waterworks buildings. – Approved 17/8/2012

In addition to the above, there have also been a number of discharge of conditions applications.

Planning Policies

National Planning Policy Framework – NPPF (2019)

Emerging London Plan (2019)

Local Plan (2018):

- LP1 Local Character and Design Quality
- LP2 Building Heights
- LP3 Designated Heritage Assets
- LP7 Archaeology
- LP8 Amenity and Living Conditions
- LP 9 Floodlighting
- LP13 Green Belt, Metropolitan Open Land and Local Green Space
- LP15 Biodiversity
- LP16 Trees, Woodlands and Landscape
- LP 18 River corridors
- LP20 Climate Change Adaptation

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- LP21 Flood Risk and Sustainable Drainage
- LP22 Sustainable Design and Construction
- LP39 Infill, Backland and Backgarden Development
- LP40 Employment and local economy
- LP41 Offices
- LP 42 Industrial Land and Business Parks
- LP44 Sustainable Travel Choices
- LP45 Parking standards and servicing

Supplementary Planning Documents:

- Conservation Area Hampton Village
- 'Sustainable Construction Checklist' (2016)
- Hampton Village Plan
- Listed Buildings

Planning Consideration

The main issues to consider in a formal application will include:

- i. Principle of Development
- ii. Design, local Character and heritage assets
- iii. Flood Risk
- iv. Trees and Ecology
- v. Residential Amenity
- vi. Transport, Highways and Parking
- vii. Sustainability
- viii. Archaeology
- ix. Contaminated land
- x. Other Matters

Principle of Development

Policy LP40 of the Local Plan states that the Council will support a diverse and strong local economy by requiring land in employment use to be retained in employment use for business, industrial or storage purposes.

Policy LP41 of the Local Plan states the Council will support a strong local economy and ensure there is a range of office premises within the borough, particularly for small and medium size business activities within the borough's centres, to allow businesses to grow and thrive.

Policy LP42 of the Local Plan states the borough has a very limited supply of industrial floorspace and demand for this type of land is high. Therefore the Council will protect, and where possible enhance, the existing stock of industrial premises to meet local needs. The Policy goes on to state *"development of appropriate scale industrial uses, and improvement and expansion of such premises, is encouraged. New industrial space should be flexible and adaptable for different types of activities and suitable to meet future needs, especially to provide for the requirements of local businesses"*.

As stated above in the site description and planning history sections, the site is in existing B1 use for laboratory/office use as well as ancillary uses including a car park and servicing area, ancillary cafeteria and staff facilities, landscaping and electricity substation following the first phase at the Riverdale Buildings, completed in 2018.

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The redevelopment of the Riversdale Building (Phase 1 of the works approved in 13/2047/FUL) is almost complete. The applicant submitted plans for the proposed redevelopment of the Morelands Building which was approved as phase 2 of planning permission 13/2047/FUL. It is noted that there is a condition on the original 2013 permission which restricted office floorspace to 2500sqm of net lettable office space for transport management reasons and there were infrastructure payments to mitigate transport impacts secured by a S106 based on this figure. This will need to be removed or varied if floor space were to increase as part of a future application.

This pre application proposes alterations to the proposed development of the approved phase 2 focusing on the redevelopment of the existing Morelands Buildings into additional laboratory and manufacturing facilities for Touchlight Genetics Ltd. These consist of:

1. Install new rooflights to the arcades and louvres within the existing lantern clerestory glazing
2. Install a new louvred plant area to the rear of the Arcades
3. Provide BWIC holes through the existing walls from the new plant area.
4. New external canopy to the front elevation Riverdale Buildings
5. Install a new louvred plant area to the rear of the Arcade
6. New external canopy to the front elevations Site Wide
7. Install new substation and 2no. generators to increase electrical provision on the site.

Given the existing use of the site, the principle for further B1 use is established. In principle, an employment led redevelopment of these Listed Buildings for laboratory use is supported. Improvement and expansion of premises is encouraged in Policy LP42 but any new industrial type space should be flexible and adaptable to different types of activities and suitable to meet future needs, especially to provide for the requirements of existing and local businesses. Further material planning considerations will now be commented on below.

Design, Local Character and Heritage Assets

Section 66 of The Planning (Listed Buildings and Conservation Areas) Act 1990,- In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features. Section 72 of The Planning (Listed Buildings and Conservation Areas) Act 1990, requires special attention to be paid to the desirability of preserving or enhancing the character or appearance of the conservation area. There is a statutory presumption and a strong one, against granting planning permission for any development which would fail to preserve the setting of a listed building or character and appearance of a conservation area.

Paragraph 193 of the NPPF states 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 LP3 of the Local Plan states: *The Council will require development to conserve and, where possible, take opportunities to make a positive contribution to, the historic environment of the borough. Development proposals likely to adversely affect the significance of heritage assets will be assessed against the requirement to seek to avoid harm and the justification for the proposal.*

Policy LP1 states new development must be of a high architectural quality based on sustainable design principles. Development must respect local character and contribute positively to its surrounding based on a thorough understanding of the site and its context.

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To ensure development respects, contributes to and enhances the local environment and character, the following will be considered when assessing proposals:

1. compatibility with local character including the relationship to existing townscape, development patterns, views, local grain and frontages as well as scale, height, massing, density, landscaping, proportions, form, materials and detailing;
2. sustainable design and construction, including adaptability, subject to aesthetic considerations;
3. layout, siting and access, including making best use of land;
4. space between buildings, relationship of heights to widths and relationship to the public realm, heritage assets and natural features;
5. inclusive design, connectivity, permeability (as such gated developments will not be permitted), natural surveillance and orientation; and
6. suitability and compatibility of uses, taking account of any potential adverse impacts of the co-location of uses through the layout, design and management of the site.

At para.4.1.3, Policy LP1 requires developers and applicants to take a sensitive approach to the architectural design of new buildings, extensions and modifications to existing buildings, as well as landscape proposals. The Council does not wish to encourage a particular architectural style or approach but expects each scheme to be to a high quality, with very high quality expected within Conservation Areas. Schemes should be based on a sound understanding of the site and its context, following the locally specific guidance set out in the Village Planning Guidance SPDs.

The pre application site consists of a number of Grade II listed buildings and also forms part of the Hampton Village Conservation Area. The Council's Conservation officer has previously commented on the buildings on previous schemes in 2013, 2014 and 2018 and has commented on the current proposal.

These imposing Victorian industrial buildings form part of the original Hampton Waterworks complex. It appears from the submitted information that these current proposals are largely amendments and additions to the existing consents, to which the Council's conservation officer is unlikely to object to subject to further information. Within the information submitted, the proposal outlines how the majority of the works would be internal to the existing buildings with minor works to the external façade. There would not be significant external extensions to the existing buildings. The previous works have been carried out to a high standard and the new/current use is compatible with the structures and their history.

In addition to the proposed works to the listed buildings themselves, it is also proposed to include the erection of an additional substation to help facilitate the additional commercial floorspace. There are no objections to the principle of an additional substation, given from the submitted information, it appears it would be located to the rear of the site away from prominent views at the front of the site and is of a modest scale and design which respects the existing Grade II listed heritage assets.

The submitted pre application information advises that a new external canopy to the front elevation Riverdale Buildings is proposed. It is recommended that any proposals to the front of the site are modest and kept to a minimum which would need to be substantially mitigated by soft landscaping to screen from the street scene whilst not detracting from the front elevation. As part of any future application, it is strongly recommended to provide further details with regards to materials, fenestration as well as hard and soft landscaping.

Subject to further information, it is considered the proposed scheme has the potential to preserve the existing heritage assets in accordance with the above aforementioned policies.

Impact on the Green Belt

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Paragraph 143 of the NPPF states "inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances". Para 144 of the NPPF goes on to state substantial weight should be given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

Paragraph 145 of the NPPF outlines what would not constitute inappropriate development in the Green Belt. This includes:

- a) buildings for agriculture and forestry;
- b) the provision of appropriate facilities for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments;
- c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- e) limited infilling in villages;
- f) limited affordable housing for local community needs
- g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would: – not have a greater impact on the openness of the Green Belt than the existing development; or – not cause substantial harm to the openness of the Green Belt.

Policy LP13 part (A) states the borough's Green Belt and Metropolitan Open Land will be protected and retained in predominately open use. Inappropriate development will be refused unless 'very special circumstances' can be demonstrated that clearly outweigh the harm to the Green Belt or Metropolitan Open Land. "It will be recognised that there may be exceptional cases where inappropriate development, such as small scale structures for essential utility infrastructure, may be acceptable."

The policy goes on to state *When considering developments on sites outside Green Belt or Metropolitan Open Land, any possible visual impacts on the character and openness of the Green Belt or Metropolitan Open Land will be taken into account.*

Immediately South of the pre application site is the Green Belt where land use is used by Hampton Waterworks. Although the majority of the works proposed discussed above are for alterations to the existing buildings, it is strongly advised that development such as the proposed additional substation, should not encroach into the existing Green Belt. Although Policy LP13 of the local plan recognises that small structures for essential utility infrastructure may be acceptable, it would have to be demonstrated as part of a future planning application that the impact of any inappropriate development on the Green Belt are outweighed by the benefits and that 'special circumstances' test has been correctly applied.

Flood Risk

The National Planning Policy Framework seeks to direct inappropriate development away from areas at the highest risk of flooding (whether existing or future). Policy LP21 of the Local Plan 2018 states: all developments should avoid, or minimise, contributing to all sources of flooding, including fluvial, tidal, surface water, groundwater and flooding from sewers, taking account of climate change and without increasing flood risk elsewhere. Development will be guided to areas of lower risk by applying the 'Sequential Test' as set out in national policy guidance, and where necessary, the 'Exception Test' will be applied. Unacceptable developments and land uses will be refused in line with national policy and guidance, the Council's Strategic Flood Risk Assessment (SFRA) and as outlined in the

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table below.

A proportion of the site appears to be within Flood Zones 2 and 3 as designated by the Council's Strategic Flood Risk Assessment, the remainder of the site is within flood zone 1. A detailed flood risk assessment (FRA) and sustainable drainage strategy should be submitted as part of any future application outlining appropriate flood mitigation measures and the safeguarding of existing flood defences. Whether the sequential test needs to be applied is outlined in Paragraph 6.2.2 of LP21 of the Local Plan (2018) however it is acknowledged that there is an existing use on the site and the proposed phase 2 redevelopment of the Moreland Buildings would be a continuation of the existing use, therefore the sequential test would not be required in this instance.

Trees and Ecology

Policy LP16 states the Council will require the protection of existing trees and the provision of new trees, shrubs and other vegetation of landscape significance that complement existing, or create new, high quality green areas, which deliver amenity and biodiversity benefits. There are a number of mature trees adjacent to the site boundaries with a number of Tree Preservation Orders (TPOs) as well as protection as a result of the conservation area designation. A BS5837:2012 survey and implications assessment need to be submitted with any future application. Trees on or near the site which would be affected by the development should be retained and any loss of trees requires justification and mitigation through replacement. As discussed, further soft landscaping would be a benefit of the scheme and enhance the character of the area.

With regards to Ecology, the site is also in close proximity to Sunnyside Other Site Of Nature Importance. Any future planning application would need to include the following to the development is able to ensure a biodiversity net gain and would not cause adverse harm to protective species.

- Current/proposed sqm figures of soft landscaping, including species & maintenance
- A full Preliminary Ecological Appraisal (done at the correct time of year for protected species)
- Details of external lighting
- Biodiversity net gain proposals including type, spec, proposed location and maintenance

If the above cannot be achieved the proposal would be contrary to Policy LP15 of the Local Plan 2018.

Residential Amenity and Living Conditions

Policy LP8 states in considering proposals for development, the Council will seek to protect adjoining properties from unreasonable loss of privacy, pollution, visual intrusion, noise and disturbance. Whilst this is a commercial development; the 'Small and Medium Housing Sites' SPD mentions that in defining a layout, it is important that new developments do not infringe on the privacy, daylight and sunlight of adjacent properties nor that of the intended occupiers. Privacy, daylight and sunlight standards should be used as a check to ensure that a layout is acceptable but should not necessarily dictate the layout. To ensure that the privacy of occupiers is respected, the windows of main facing habitable rooms should preferably be no less than 20m apart. Where principal windows face a wall that contains no windows or those that are occluded separation distances can be reduced to 13.5m.

Any views given below are made without the basis of a site visit to the host and adjacent properties which will be done as part of any formal planning application.

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Until full floor plans and elevations are submitted as part of a planning application, officers cannot fully assess the impact of residential amenity on existing and future occupiers. However, there is no residential development immediately to the south and west of the site and to the North of the pre application site residential development is separated by Upper Sunbury Road. Although there is residential development to the East of the site, there are adequate separations from other nearby dwellings to mitigate any harmful impact and given this is a commercial development any windows providing potential overlooking opportunities could be obscured glued and fixed shut (via condition if necessary). Therefore, at this stage the scheme is not considered to create a significant adverse impact on existing residential amenity in terms of overlooking, overbearing and loss of light.

Transport, Highways and Parking

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

In general, it is expected that in low PTAL areas (0-3) the relevant parking standards should be met. However Policy LP45 also goes onto state how the provision of front garden car parking should be resisted unless it can be demonstrated that:

- a. there would be no material impact on road or pedestrian safety;
- b. there would be no harmful impact on the character of the area, including the streetscape or setting of the property, in line with the policies on Local Character and Design; and
- c. the existing on-street demand is less than available capacity.

As stated within the planning history section above, the pre application site has extant permission for redevelopment as a B1c land use site with planning permission (ref 13/2047/FUL) granted for the redevelopment of the site in two phases to provide 4,999m2 gross internal area floorspace of B1c land use, of which 2,522m2 would be useable office space. The trip generation analysis submitted and approved by the Council's transport officer at the time assumed that 2,522m2 of the approved floorspace would be useable office space. Two subsequent applications were approved in 2018 (18/2442/VRC and 18/2429/LBC) which were adjudged not to have a significant enough impact on the transport network to deem a transport assessment or statement to be required.

The Council's Transport officer has advised that it is considered unlikely that the proposed works as outlined would have a significant impact on the operation of the transport network. However, the applicant must clarify whether the proposed gross internal area floorspace within the Morelands Building will remain the same or increase, and, if the latter, how much the useable office space will increase by in square metres. If there is intended to be an increase on what was approved in 2013, an updated or new transport assessment or statement would need to be provided because the extant permission is more than three years old. This will have to be completed in accordance with the Government Guidance on Transport Assessment (Department for Transport, 2007), which can be accessed at: <https://www.gov.uk/government/publications/guidance-on-transport-assessment>.

Sustainability

Policy LP20 states that new development, in their layout, design, construction, materials, landscaping and operation, should minimise the effects of overheating as well as minimise energy consumption in accordance with the following cooling hierarchy; the proposed scheme shows strong elements which complies with this overall.

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All new developments should include measures capable of mitigating and adapting to climate change to meet future needs and reduce carbon dioxide emission.

Policy LP22 requires development of 1 dwelling unit or more, or 100sqm or more of non-residential floor space (including extensions) to comply with the Sustainable Construction Checklist SPD. Development that results in a new residential dwelling, including conversions, change of use, and extensions that result in a new dwelling unit, will be required to incorporate water conservation measures to achieve maximum water consumption of 110 litres per person per day for homes (including an allowance of 5 litres or less per person per day for external water consumption).

It also requires developments to achieve the highest standards of sustainable design and construction in order to mitigate against climate change. Further, all new residential buildings should achieve a 35% reduction in carbon dioxide emissions. Targets are expressed as a percentage improvement over the target emission rate (TER) based on Part L of the 2013 Building Regulations. C. This should be achieved by following the Energy Hierarchy: 1. Be lean: use less energy 2. Be clean: supply energy efficiently 3. Be green: use renewable energy

Additionally, all new developments should include measures capable of mitigating and adapting to climate change to meet future needs.

The following will be required as a minimum in any formal application:

- A completed Sustainable Construction Checklist (http://www.richmond.gov.uk/sustainable_construction_checklist)
- Energy Report demonstrating how the above targets will be met
- 35% reduction in CO2 emissions and 20% of energy from renewable sources are also expected and where these are not achievable, justification must be provided within the Energy Report. More information can be found at the link: http://www.richmond.gov.uk/sustainable_construction_checklist

Archaeology

The site has been identified within an area of Archaeological Priority, Hampton - Early Medieval settlement. As part of any future planning application a Written Scheme of Investigation would need to be submitted to ensure there would not be any adverse impact on Archaeological heritage assets.

Contamination

Part of the site has been identified to have been impacted by contamination given the previous industrial use. As part of any future planning application, a contaminated land assessment should be submitted where the Council's Environmental Health officer would be consulted.

Other Issues

Community Infrastructure Levy (CIL)

The following development types will be liable to pay CIL:

- Development comprising 100 square metres or more of gross new build internal floor space;
- Development of less than 100 square metres of gross new build internal floor space that results in the creation of one or more dwellings.

Official

Based on the above, the proposed scheme will be CIL liable and more information on CIL can be found here www.richmond.gov.uk/community_infrastructure_levy

Community Engagement

Given the relationship of the site with surrounding properties, it is strongly recommended that the developer undertake pre-application consultation with affected neighbours. It would be beneficial if a planning application is accompanied by a Community Engagement Report which summarises the results of this engagement and describes how the scheme has evolved to mitigate any concerns raised (if any).

Validation Requirements

The LPA will only validate applications that meet its Local Validation Checklist (December 2019), for further information please see:

https://www.richmond.gov.uk/media/18348/local_validation_checklist_for_all_applications.pdf

Conclusion

There are no objections in principle to the proposed works. However further information would be required as part of a future planning and listed building application.

Without prejudice

Any given advice by Council Officers from pre-application enquiries does not constitute a formal response or decision of the Council with regard to future planning consents. Any views or opinions expressed are given in good faith and to the best of ability without prejudice to formal consideration of any planning application, which was subject to public consultation and ultimately decided by the Council. You should therefore be aware that officers cannot give guarantees about the final form or decision that will be made on your planning or related applications. Although the advice note will be brought to the attention of the Planning Committee or an officer acting under delegated powers, it cannot be guaranteed that it will be followed in the determination of future related planning applications and in any event circumstance may change or come to light that could alter the position. It should be noted that if there has been a material change in circumstances or new information has come to light after the date of the advice being issued then less weight may be given to the content of the Council's pre-application advice of schemes. You are also advised to refer to local and national validation checklist on the Council's website.

Yours sincerely



Mr Chris Tankard
Team Manager - Development Management North Area
London Borough of Richmond Upon Thames