

# PLANNING REPORT

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William Tysterman on 17 September
2021

# Application reference: 21/1671/FUL and 21/1672/LBC

Date application received	Date made valid	Target report date	8 Week date
11.05.2021	11.05.2021	06.07.2021	06.07.2021

#### Site:

The Morelands And Riverdale Buildings, Lower Sunbury Road, Hampton,

#### Proposal:

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

Status: Pending Consideration (If status = HOLD please check that all is OK before you proceed any further with this application)

APPLICANT NAME AGENT NAME

- Ms Emma Mounsey
- 72
- Welbeck Street
- London
W1G 0AY

DC Site Notice: printed on and posted on 18.06.2021 and due to expire on 09.07.2021

#### Consultations:

#### Internal/External:

Consultee	<b>Expiry Date</b>
14D POL	22.06.2021
LBRUT Transport	22.06.2021
LBRuT Ecology	22.06.2021
LBRUT Environmental Health	22.06.2021
21D Urban D	29.06.2021
Thames Water Development Control Department	09.07.2021
Environment Agency	09.07.2021
GLAAS 1st Consultation	09.07.2021
English Heritage 1st Consultation	09.07.2021

## **Neighbours:**

38 Belgrade Road, Hampton, TW12 2AZ, - 08.06.2021

2 River View Cottages, Upper Sunbury Road, Hampton, TW12 2DT, - 08.06.2021

3 River View Cottages, Upper Sunbury Road, Hampton, TW12 2DT, - 08.06.2021

1 River View Cottages, Upper Sunbury Road, Hampton, TW12 2DT, - 08.06.2021

37 Belgrade Road, Hampton, TW12 2AZ, - 08.06.2021

39 Belgrade Road, Hampton, TW12 2AZ, - 08.06.2021

41 Belgrade Road, Hampton, TW12 2AZ, - 08.06.2021

15 Spring Grove, Hampton, TW12 2DP, - 08.06.2021

12 Spring Grove, Hampton, TW12 2DP, - 08.06.2021

10 Spring Grove, Hampton, TW12 2DP, - 08.06.2021

16 Spring Grove, Hampton, TW12 2DP, - 08.06.2021

14 Spring Grove, Hampton, TW12 2DP, - 08.06.2021

13 Spring Grove, Hampton, TW12 2DP, - 08.06.2021

11 Spring Grove, Hampton, TW12 2DP, - 08.06.2021

# **History: Development Management, Appeals, Building Control, Enforcements:**

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Application:12/2185/LBC Demolition of later 20th century brick porch and steel shed structre 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.
Application:12/2186/CAC Demolition of later 20th century brick porch and steel shed structre 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.
Application:12/4079/LBC Repairs and restoration of the building fabric. Cleaning of existing external/internal facades. Opening up and structural investigations of existing floorslabs
Application: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
Application:13/2101/LBC Restoration, refubishment and alterations to listed buildings in connection with B1 development, car park and servicing, ancillary cafeteria and staff facilities, landscaping and electricity substation
Application:12/4079/DD01 Details pursuant to condition U59153 (excavation /trial holes), Part U59151 (Method of cleaning)
Application:13/2047/DD01 Details pursuant to condition U66661 - external details (partial) ,U6665 - Archaeology (partial), U66666 - restriction on piling,
Application:13/2101/DD01 Details pursuant to condition U65650 - specific details (Partial compliance)
Application:15/5150/FUL Insertion of 6 windows within existing arches on the north elevation.
Application:15/5151/LBC Insertion of 6 windows within existing arches on the north elevation.
Application:13/2047/DD02 Details pursuant to conditions U66661- external details (partial - Doors facing Sunbury Rd)
Application:13/2101/DD02 Details pursuant to condition W65650 - Specific Details - details of glazed internal doors; new internal doors; heating/cooling system; light fittings; entrance doors facing Sunbury Road; workshop cladding; glazed floor openings
Application:13/2101/DD03 Details pursuant to condition U65650 - Specific Details (IN PART) of Listed Building Consent 13/2101/LBC.
Application:13/2047/DD03 Details pursuant to condition U66661 (Details to be Submitted for Approval)(IN PART) of Planning Permission 13/2047/FUL.

Status: GTD Application:13/2101/DD04 Date:01/06/2018 Details pursuant to condition U65650 - Specific Details of Listed Building Consent 13/2101/LBC. **Development Management** Status: GTD Application:13/2047/DD04 Date:01/06/2018 Details pursuant to condition U66661 (Details to be Submitted for Approval) of Planning Permission 13/2047/FUL. **Development Management** Status: GTD Application:13/2047/DD05 Date: 19/07/2018 Details pursuant to condition U66670 - Plant Noise Assessment of Planning Permission 13/2047/FUL. **Development Management** Status: GTD Application:18/2319/LBC Date:04/09/2018 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. **Development Management** Status: GTD Application:18/2429/LBC Date:12/09/2018 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. **Development Management** Status: GTD Application:18/2442/VRC Date:10/09/2018 Variation of condition U66660 Decision Details (approved drawings) of Planning Permission 13/2047/FUL. **Development Management** Status: PCO Application:21/1671/FUL Date: 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 **Development Management** Status: PCO Application:21/1672/LBC "Internal and external works to the Morelands Arcades including the Date: 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" **Development Management** Status: PCO Application:21/2871/VRC Variation of condition U66660 (Approved Drawings) of planning permission Date: 13/2047/FUL to allow for amendments to the Morelands Engine House, the Morelands Arcades and site works including amended landscaping and the re-location of the bin store. **Development Management** Status: PCO Application:21/2872/LBC Internal works to the Morelands Engine House and Morelands Arcades Date: including alterations to the design for the reception and meeting rooms, developed proposals to the office layouts on the mezzanine and laboratories at ground floor level, the provision of a lift and staircase and a connection between the Engine House and the Arcades. External works to the Morelands Engine House and Morelands Arcades including the provision of an external lift, alternations to the external front door of the building, additional details for the builders work holes proposed between the plant screen and the existing building fabric and alterations to existing windowsand doors .

**Building Control** 

Deposit Date: 13.02.2013 Conversion of former thames water building to cateria, kitchen laboratories

offices and associated facilities at riverdale building

Reference: 13/0281/IN

**Building Control** 

Conversion of former Thames Water buildings to cafeteria, kitchen, Deposit Date: 13.02.2013 laboraories, offices and associated facilites at Riverdale Buildings Gate A Reference: 13/0282/IN **Building Control** Deposit Date: 16.05.2017 Install one or more new circuits New full electrical installation (new build) Reference: 17/NIC01576/NICEIC **Building Control** Deposit Date: 29.04.2021 Ground floor clean room fit out Reference: 21/0740/IN **Building Control** Deposit Date: 19.07.2021 Lowering of existing floor slab, installation of offices above Clean room, part repairs and part reroofing Reference: 21/1225/IN **Enforcement** Opened Date: 09.09.2014 **Enforcement Enquiry** Reference: 14/0479/EN/UBW

### **Site Description and Proposal**

The site is located on the North bank of the River Thames in Hampton. The Hampton Water works were formed in 1852 and 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 now 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 fall within the Hampton Village Conservation Area. The site is also within an Area of Archaeological Priority, within Flood Zones 1 and 2 as designated by the Council's Strategic Flood Risk Assessment (SFRA) and also is within the Thames Policy Area. Green Belt land and an area of Other Site of Nature Importance immediately adjoin the application site to the South. There is also an Article 4 direction restricting works to basements.

The planning application reference (21/1671/FUL) is as follows: *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.* 

The listed building consent application reference (21/1672/LBC) is as follows: *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.* 

The proposals have been amended within the determination period. The alterations involved lowering the height and changing the materials/colour of the screen to the external plant enclosure. This will be discussed further below.

#### **Policies**

National Planning Policy Framework Sections (NPPF) (2021)

# Development Plan

London Plan (2021)

Richmond Local Plan (2018)

# 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
- LP 10 Local Environmental Impacts, Pollution and Land Contamination
- LP13 Green Belt, Metropolitan Open Land and Local Green Space
- LP15 Biodiversity
- LP16 Trees, Woodlands and Landscape
- LP18 River corridors
- LP20 Climate Change Adaptation
- 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

## **Relevant Planning History**

21/2872/LBC - Internal works to the Morelands Engine House and Morelands Arcades including alterations to the design for the reception and meeting rooms, developed proposals to the office layouts on the mezzanine and laboratories at ground floor level, the provision of a lift and staircase and a connection between the Engine House and the Arcades. External works to the Morelands Engine House and Morelands Arcades including the provision of an external lift, alternations to the external front door of the building, additional details for the builders work holes proposed between the plant screen and the existing building fabric and alterations to existing windowsand doors . - Pending

21/2871/VRC - Variation of condition U66660 (Approved Drawings) of planning permission 13/2047/FUL to allow for amendments to the Morelands Engine House, the Morelands Arcades and site works including amended landscaping and the re-location of the bin store. - Pending

21/1672/LBC - "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" - Pending

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

13/2047/DD05 - Details pursuant to condition U66670 - Plant Noise Assessment of Planning Permission 13/2047/FUL. – Approved 19/7/2018

13/2101/DD04 - Details pursuant to condition U66661 (Details to be Submitted for Approval) of Planning Permission 13/2047/FUL. – Approved 1/6/2018

13/2101/DD03 - Details pursuant to condition U65650 - Specific Details (IN PART) of Listed Building Consent 13/2101/LBC. – Approved 27/10/2017

13/2047/DD03 - Details pursuant to condition U66661 (Details to be Submitted for Approval) (IN PART) of Planning Permission 13/2047/FUL. – Approved 27/10/2017

13/2047/DD02 - Details pursuant to conditions U66661- external details (partial - Doors facing Sunbury Rd) - Approved 2/5/2017

13/2101/DD02 - Details pursuant to condition W65650 - Specific Details - details of glazed internal doors; new internal doors; heating/cooling system; light fittings; entrance doors facing Sunbury Road; workshop cladding; glazed floor openings – Approved 2/5//2017

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/DD01 - Details pursuant to condition U66661 - external details (partial) ,U6665 - Archaeology (partial), U66666 - restriction on piling, - Approved 14/10/2015

13/2101/DD01 - Details pursuant to condition U65650 - specific details (Partial compliance) - Approved 14/10/2015

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

#### **Public Representations**

One property objected to the applications, this representation is summarised below:

- Object to the new plant installation and enclosure on the North Elevation (Upper Sunbury Road) due to visual impact of the screening and the potential noise
- Require further detail as to the structures to be placed in front of the east elevations near the main gate. (At junction of Upper and Lower Sunbury).

### **Amendments**

Amended plans and additional information were submitted regarding changes to the proposed screen/plant on the North elevation, and additional information with regards to the public benefits of the proposal.

#### **Consultee Comments**

LBRUT Urban Design – Objection – Object to the plant screen which would adversely impact the setting of the Grade II listed building and the conservation area, further comments detailed below. No objection to other elements of the proposal subject to conditions.

LBRUT Transport officer – No objection, comments summarised below.

Environmental Health – No objection, recommend noise condition. Further comments summarised below.

Historic England (Heritage) – No formal comments received.

Historic England (GLAAS) – No objection, conclude that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest. No further assessment or conditions are therefore necessary.

Thames Water – No objection, recommend conditions, comments summarised below

Environment Agency – No objection, refer to flood risk standing advice

#### **Professional Comments**

As set out in the Planning and Compulsory Purchase Act 2004 (Section 38(6)) and the Town and Country Planning Act 1990 (Section 70(2)) in dealing with planning applications the Local Planning Authority shall have regard to the provisions of the development plan, so far as material to the application, and to any other material considerations. This position is repeated in the NPPF. The development plan is defined in Section 28(3)(b) of the 2004 Act as "the development plan documents (taken as a whole) that have been adopted or approved in that area".

- Principle of Development
- Design and Heritage impacts
- Green Belt
- Trees and Ecology
- Neighbouring Amenity
- Highway Safety
- Archaeology
- Fire Safety
- Other Matters
- Planning Balance

## 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. The Council will protect, and where possible enhance, the existing stock of industrial premises to meet local needs. The Policy goes onto 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 use for laboratory/office use as well as ancillary uses including a car park and servicing, ancillary cafeteria and staff facilities, landscaping and electricity substation following the first phase at the Riverdale Buildings, completed in 2018. The redevelopment of the Riversdale Building (Phase 1 of the works approved within applications 13/2047/FUL and 13/2101/LBC) 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 and the above listed building consent. 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 planning application and listed building consent proposes alterations to the proposed development of the approved phase 2 focusing on the redevelopment of the existing Morelands Officer Planning Report – Application 21/1671/FUL Page 8 of 18

Buildings into additional laboratory and manufacturing facilities for Touchlight Genetics Ltd. The existing use of the site would remain unchanged as part of the current application. In principle, the employment led redevelopment of these Listed Buildings for laboratory use is supported by the Development Plan. Improvement and expansion of premises is encouraged in Policy LP42 of the Local Plan, 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.

# Design/ Heritage impacts

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 66 of the Act). 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 character and appearance of a conservation area.

Paragraph 199 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.

Local Plan 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.

The application site consists of a number of Grade II listed buildings and also forms part of the Hampton Village Conservation Area. Planning permission and listed building consent is sought for the following works to the Morelands Arcades and the wider site:

- Alterations to the internal layout of the laboratories and office Mezzanine,
- A new double door entrance to the Morelands Arcade and East Arcade, and entrance to the Beam House.
- Installation of a new louvred plant area to the rear of the Arcades, with associated service penetrations and 2no. doors through the existing walls from the new plant area to the Morelands Buildings, and a new escape staircase.
- A new electrical substation with screening and landscaping located in the north east corner of the site.

Within the context of the Hampton Village Conservation Area, the waterworks are identified as standing at the entrance to the village both by the river and from Sunbury Road. The Conservation Area Statement notes 'the monumental mid-Victorian gault brick pumping houses, a local landmark, stand in ample grounds behind handsome iron railings and perimeter planting, some in yew...these clean and floodlit buildings are particularly impressive at night.'

The buildings at the Hampton Waterworks have architectural interest as surviving examples of Victorian public infrastructure such as stations, hospitals, prisons and other infrastructure works that were largely new engineering functions requiring a suitable architectural expression. Of the internal spaces, overall, the areas of primarily significance consist of the Morelands and Riverdale engine houses, together with the Riverdale workshop, smithy and engine house including its basement – most of which has been subject to earlier conversion and re-use. The former boiler rooms and coal stores forming the lower 'arcade' sections of both buildings are of secondary significance. The architectural, as opposed to the purely engineering aspects of the buildings, were

intended in part to give the buildings a recognisable appearance to reflect their importance as a public utility. Whilst less decorative externally than some of the other Hampton Waterworks buildings, the Morelands building still clearly exhibits architectural interest in its blind arch and colonnade detailing of its central range flanked by two imposing pavilions. Overall the buildings on the application site are considered to be an impressive architectural composition, particularly in views along Upper Sunbury Road, which contributes to its overall significance.

The Morelands and Riverdale buildings had acquired a number of additions and extensions over the years that either had no significance or were negative factors that detracted from significance. These features were removed following the grant of listed building consent in 2012 as stated within the planning history section. The whole complex has also been subject to more recent planning and listed building consent for conversion to office/laboratory space, of which only the Riverdale buildings have been completed.

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.

The site history section above outlines planning permission and listed building consents already granted on the site. Permission has already been granted for the insertion of a mezzanine level within the arcades. As part of the current planning application/listed building consent it is proposed for this structure to be raised from the original proposed level by 950mm to ensure that the service zone and the laboratories can be incorporated at ground floor and offices at first floor without impacting on the existing structure or roof of the listed building (previously offices were proposed at ground floor and laboratories first floor as part of application refs 13/2047/FUL and 13/2101/LBC). This would also not affect the approved use on the site. Given this would be an internal change it is not considered this would adversely impact on the conservation area. The Council's Conservation officer has no objection to these works which are similar to previous permissions. It is considered that this element of the proposal would preserve the setting of the Grade II listed building and the surrounding conservation area.

It is proposed that 16 new conservation rooflights are inserted in the Morelands West Arcade Roof, and 12 new conservation rooflights are inserted to the Morelands East Arcade to provide additional light to the offices proposed at first floor level. Whilst it is noted the number of rooflights is quite high, the conservation officer has raised no objection to this element subject to further details discussed below. Therefore, it is considered that, subject to conditions, this element of the proposal would preserve the setting of the Grade II listed building and the surrounding conservation area.

The existing single door in the glazed screen to the central arcade on the South elevation is proposed to be amended to allow for a double door entrance into the building. This would be as the design installed in the Riverdale buildings approved on previous consents. The same double door entrance would be incorporated into the far bay of the East Arcade. It is considered that this element of the proposal would preserve the setting of the Grade II listed building and the surrounding conservation area.

The application also proposes to install a new electrical substation and enclosure to match the design of the existing approved substation. The applicant has outlined that this is required for the power upgrade works on site and is located discreetly in the north east corner of the site. Further details including the proposed materials, including walls/base, roof and fenestration (doors/windows) have been submitted upfront and are considered acceptable. The proposed brick for the sub station would be the same as that used for the first phase substation (a stock of bricks was retained for future works). The actual brick itself is a hand made gault, imported as a 'Soft Yellow'. The pointing is proposed a flush lime mortar supplied by Limetec to match the existing. Subject to a compliance condition, it is considered that this would preserve the setting of the Grade II listed building and the surrounding conservation area.

The most substantial part of the proposed works is to demolish existing brick plinth area as existing and install a new louvred plant screen to the rear of the Moreland building Arcades which would also include two new access doors and service penetrations through the existing walls from the new plant area, into the Engine House and Arcades. There is also the need for a metal staircase Officer Planning Report – Application 21/1671/FUL Page 10 of 18

from the first floor level for escape from the first floor offices, that will be obscured within the plant enclosure. The proposed larger plant area is required to service the new laboratory spaces at ground floor level, the applicant considers that it would be less sensitive for it to be situated in an external enclosure that is not connected to the listed fabric of the building than internally. The plant enclosure would include a louvred screen design that will shield from view the new plant equipment and provide a uniform frontage within the streetscape of the Upper Sunbury Road.

Whilst officers were supportive in principle of additional plant necessary for the work being undertaken in the buildings, the Council's Conservation officer raised concerns about the original form of proposed louvre screen which was of significant length and height, running almost the entire length of the listed building facing the Upper Sunbury Road and accordingly objected to this element of the scheme. The Conservation Officer was of the opinion that there would be considerable visual harm to one of the main elevations of the listed building in a prominent location from the public highway. And that creating connection holes for the screen through the listed fabric of the building may result in further visual and physical harm. As to whether this could be mitigated by soft landscaping to the front boundaries, the Conservation Officer considered it unlikely to significantly mitigate the harm as it would still remain visible from the road.

Significance for the purposes of heritage policy is the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic, or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. The significance of the Morelands and Riverdale Buildings is therefore made up a combination of factors, i.e. the setting of listed buildings themselves and the conservation area. Listed buildings are considered to inherently have a high significance as they meet the national criteria for listing as buildings of special architectural and historic interest, it is recognised that different aspects of the building contribute in different ways to that significance.

Paragraph 200 of the NPPF states any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. In this case the setting of the Grade II listed Morelands Building and the conservation area.

Following the receipt of the Conservation Officers comments, discussion took place with the applicants into possible alternative solutions of siting the screen which are less intrusive. Alternative materials for the screen were also discussed. A number of possible locations were identified within a revised design and access statement submitted by the applicant and the pros and cons of each considered including operational as well as physical/visual/heritage factors.

Whilst the applicant's investigations have identified that it would not be possible to reduce the ground level of the plant enclosure, a detailed review of the specification of required plant has enabled the plant enclosure to be amended in the following ways:

- Reduced in height from that previously proposed which would reduce the visual impact.
- The acoustic enclosures would sit behind a timber screen, stained to a colour that would complement the gault brickwork of the Morelands Building and designed to reflect the architectural rhythm and spring of the blind arches and pilasters along the wall.
- The screen would be set in from the Engine House at either end to give an appropriate 'shadow gap' between the enclosure and the historic building.
- Planting behind the iron railings would further lessen the impact of the screen however as stated above, soft landscaping would only partially mitigate this element of the proposal at best. A visual comparison of the amendments is set out below:



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The Council's conservation officer has commented on the amended proposals. The amendments are welcomed, however still considered to be of limited benefit. The new door and proposed escape stair on the exterior of the building would also contribute to the identified harm to the heritage assets.

It is therefore concluded that, whilst it is considered that the proposed internal changes, rooflights, central arcade door and detached substation are considered to preserve the grade II listed building and conservation area, the loss of historic fabric in order to accommodate the plant connections and escape opening, and the screen added in front of the building to a significant height, there will be harm to the significance, fabric and character of the listed building as well as its setting within the surrounding conservation area. Even though the harm may not be viewed as significant it will still be harm which has been identified as less than substantial, and if given permanent listed building consent, this would be long term.

# Archaeology

The site has been identified within an area of Archaeological Priority, Hampton - Early Medieval settlement. Historic England/The Greater London Archaeological Advisory Service (GLAAS) have commented on the proposal and raises no objection and consider the proposal is unlikely to have a significant effect on heritage assets of archaeological interest and has not recommended any necessary further assessment or conditions. As such the proposal is considered to be in accordance with Policy LP7 of the Local Plan.

# **Public Benefits**

In accordance with Paragraph 201 of the NPPF, less than substantial harm to the significance of designated heritage assets should be weighed against the public benefits of the proposal, including securing its optimum viable use. In this instance, the harm is identified to both the Morelands Grade II listed building and the conservation area, i.e. two separate heritage assets therefore the public benefits accrued by the development needs to clearly outweigh all of these aspects of harm not just one.

The applicant has indicated that the proposals are fundamental works required to support Touchlights development of vaccinations to combat the COVID global health crisis and to provide rapidly deployed vaccines and gene therapy treatments on a global scale. The output of the Hampton facility is expected to provide a pivotal supply capability for the provision of DNA which is vital in the manufacture of mRNA and DNA vaccines, together with gene therapies covering significant current unmet clinical need. This not only treats the emergency and unforeseen situations such as the current ongoing Covid 19 pandemic, but also is essential to move the latest developments in oncology, cardiology and a wide variety of currently incurable inherited disease from a recognised concept to a realised pharmaceutical product. The applicant anticipates the Hampton facility (once fully utilised) would represent a sixfold increase in the available supply of DNA as a critical starting material for the medicinal healthcare uses described above. Not only would this have a significant democratising effect through the impact upon the cost of goods for these medicinal products but also will represent a significant step forward, as the current supply chains have a recognised demand shortfall, which leaves 80% of the market Officer Planning Report – Application 21/1671/FUL Page 12 of 18

currently unable to produce reliable product.

The applicant has also stated the new facility would provide a significant increase in jobs. The wider refurbishment of the Morelands and Riverdale buildings undertaken to date as outlined within the planning history above, has facilitated a 15% increase in jobs from 50 full time equivalent (FTE) roles to 67 FTE roles. The proposed works as part of the current applications would facilitate over double the number of jobs from 50 to 105 FTE roles from that originally provided on site by the end of Q1 2022. In addition, there would be a multiplier effect of economic benefits and wider employment in the broader sector once increased production can take place by virtue of the additional supply of DNA as a critical starting material from Hampton. It is also likely that this would also allow further use of nearby local services. The proposal would also create modest benefits of jobs during the construction phase.

The proposals involve the wider restoration and refurbishment of the listed building and bringing it back into a viable use for the future. Whilst previous permissions have been granted as outlined above, currently the Morelands building is not in use. The proposals as part of the current applications would add to the significant investment already made by the applicant to restore the buildings and return them to a viable use securing their future. The applicant's position is that 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.

As stated in earlier sections of the report, the proposed use has a strong resonance with the past. The very reason for the development of Hampton Waterworks was in response to the demand for clean water to help prevent then spread of disease, in particular cholera – which in itself forms part of the special historical interest of the listed building. The proposed use will therefore continue its original purpose of helping to prevent the spread of disease. There is a genuine desire from the applicant to find a further purpose that mirrors the original impact of the Hampton Facility (in terms of the prevention of cholera), as a site with a continuing heritage and narrative based upon harnessing scientific-led technology for social benefit. Whilst the application site is constrained given the heritage assets, there is, however, a genuine commitment to the area to bring the buildings back into a viable use. As part of the current applications the majority of the proposals are considered to be acceptable in relation to the heritage assets other than the works to the rear (North) elevation and the plant enclosure.

It is for the planning officer to conclude as to whether the public benefits put forward by the applicant outweigh the less than substantial harm to heritage assets identified and supported by the advice from the Conservation Officer. Given the new doors and fire escape would be important for the development both in terms of the internal layout and allowing access and maintenance to the plant enclosure, the scheme as a whole has been weighed against the public benefits. It has not been suggested that without these works, the site would be unable to operate at all given the previous consents that have been granted. In this context, the public benefit that this development would bring would therefore include the provision of this enhanced and expanded service. Taking all of the above into account including the current need for MRNA vaccine development and the significant increase in jobs these works would enable, it is considered the proposed public benefits do outweigh the less than substantial harm to the significance of heritage assets which has been identified. The scheme would therefore be compliant with the aforementioned national and local policies and the statutory tests are met.

Conditions are recommended to be imposed in this regard based on advice from the Conservation Officer and which are agreed as meeting the necessary tests. An informative should be added which encourages removal of the plant and screen and re-instatement of the façade to its current appearance once the need for the equipment no longer exists.

#### Impact on the Green Belt

Immediately South of the application site is the designated Green Belt where land use is used by Hampton Waterworks. No works are proposed within the Green Belt itself. Given the proposals would be separated/screened from the Green Belt to the South by the existing listed buildings, it is not considered the proposals would adversely impact on the open nature and character of the Green Belt in this location or conflict with the purposes of including land within the Green Belt. As Officer Planning Report – Application 21/1671/FUL Page 13 of 18

such the proposal is considered to accord with Policy LP13 of the Local Plan.

#### 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 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, however the submitted site specific flood risk assessment outlines 88% of the site is within flood zone 1. Given the existing use on the site and the proposed phase 2 redevelopment of the Moreland Buildings would be a continuation of the existing use, the sequential test would not be required in this instance. The submitted flood risk assessment outlines there would not be a significant adverse impact in terms of flood risk and the Environment Agency has raised no objections recommending the proposal follows standing advice.

There are several Thames Water assets on the site. Thames Water has commented on the application and with regards to surface water and foul water sewage network infrastructure capacity it would not object to the proposal based on the information provided. Thames Water notes the proposed development is located within 5m of a strategic water main and do not permit the building over or construction within 5m, of strategic water mains and has therefore requested a condition for further information regarding how the applicant would impact this issue. Subject to this Thames Water has advised that with regard to water network infrastructure capacity, it would not object to the proposal. Further informatives will be added to the decision notice in the event planning permission is granted. Subject to the above the proposal is considered to be in accordance with Policy LP21 of the Local Plan.

# 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 several 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. The minor works to the Moreland listed building itself, the proposed plant enclose/screen and proposed substation would not be located in close proximity to these trees. As such it is considered the proposal is acceptable and in accordance with Policy LP16 of the Local Plan.

With regards to Ecology, the site is also in close proximity to Sunnyside Other Site of Nature Importance. The proposed works would not encroach into the OSNI. The Council's Ecology officer has commented on the proposal and raised no objections subject to conditions regarding hard and soft landscaping, external lighting and biodiversity net gain. Whilst there is currently no substantive evidence that there are existing protected species such as bats on the site, given the age of and the fact the Morelands Building is currently unused on site, an informative will be added to ensure the applicant is aware all works must cease and Natural England/a suitably qualified ecologist contacted for advice should bats be encountered on the site.

Subject to the above, it is considered the proposal is in accordance with Policy LP15 of the Local Plan 2018.

# Residential Amenity and Living Conditions

Policy LP8 is relevant. There is no residential development immediately to the south and west of the site and to the North of the application site residential development is separated by Upper Officer Planning Report – Application 21/1671/FUL Page 14 of 18

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. The scheme is not considered to create a significant adverse impact on existing residential amenity in terms of overlooking, overbearing and loss of light.

An objection raised concerns regarding the noise impact from the proposed plant enclosure. The application is accompanied by a Noise report. The Council's Environmental Health officer has commented on the proposal specifically with regards to noise and has raised no objections. It is noted that previous consents outlined within the planning history have imposed conditions in respect of noise limits and given this application would be to amend a use which has already been granted, it is considered reasonable and necessary for a similar condition to be added should planning permission be granted in this case.

As such subject to the above it is considered the proposal would be in accordance with Policy LP8 of the Local Plan.

# Transport, Highways and Parking

In general, it is expected that in low PTAL areas (0-3) the relevant parking standards should be met. Policy LP45 states 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 application site has extant permission for redevelopment 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 commented on the current proposals and has raised no objections to any of the proposals on transport or highway safety grounds and considers that all works can be carried out on site with vehicles being able to park on site while construction takes place.

As part of the public representation received, a neighbour requested further information regarding I "the structures to be placed in front of the east elevations near the main gate. (At junction of Upper and Lower Sunbury gate)". However no changes are proposed to the main access to the West of the site or the existing emergency access gates to the East of the site adjoining Thames Close. As such the proposal is considered to be in accordance with Polices LP44 and LP45 of the Local Plan.

#### Fire Safety

London Plan Policy D12 requires the submission of a Fire Safety Statement on all planning applications. The Fire Safety Statement should be presented as a standalone document. This application has been accompanied by a Fire Strategy Statement dated 14/06/2021 to meet this requirement.

# Other Matters

It was commented on as part of representation that not enough residents had been consulted as part of the public consultation period, particularly residents of Thames Close. All residents adjoining the red line of the application site have been consulted, the applications have also be advertised via site notice and press notice given their heritage asset designation. The Council is therefore satisfied that public consultation has been carried out legally and sufficiently.

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# Conclusion and Planning Balance (ref 21/1671/FUL)

The NPPF has at its heart the presumption in favour of sustainable development. To be sustainable, development must, as noted in paragraph 6 of the NPPF, strike a satisfactory balance between the economic, environmental and social considerations.

In terms of the economic dimension of sustainable development, the proposal would contribute towards economic growth, including job creation, not only additional jobs for work in the proposed laboratory and office space on the site but also during the construction phase and in the longer term through the additional population assisting the local economy through spending on local services / facilities through combined trips into the nearby centres within the Borough.

In terms of the environmental dimension of sustainable development, the report outlines there would not be an adverse impact in terms of ecology, protected species and other environmental factors. As part of permission granted conditions have been recommended for soft landscaping as well as ecological enhancements.

In terms of the social dimension, as clearly outlined in this report there will be less than substantial harm to the significance of heritage assets as identified. Due to the above, decision maker must therefore weigh the harm against the public benefits of the scheme. An application can only be approved if the public benefits clearly outweigh the harm caused to the heritage constraints. Officers have demonstrated in the main body of the report that this will be the case.

It is concluded that the development of this site will: -

- Cause less than substantial harm to the significance of two heritage assets, this is outweighed by Public Benefits
- Not cause significant detrimental impact to residential amenity
- Maximise opportunities for use of public transport, walking and cycling
- Manage flood risk and drainage effectively
- Have no significant adverse impacts on features of landscape or ecological value
- Provide appropriate infrastructure to meet the needs generated by the development through wheeled bin provision

For these reasons, the proposal is considered to constitute sustainable development and accords with the Development Plan. The material considerations have been fully considered and the application is therefore recommended for approval subject to the stated planning conditions.

RECOMMENDATION – Approve subject to conditions to include those listed below.

- Time Limit
- Approved plans
- Materials
- Architectural details
- Hard and soft landscaping including boundary treatments
- Ecological Enhancements
- External Lighting
- Mechanical noise
- Fire safety compliance

# Informative

Removal of screen and plant enclosure if no longer required.

Bats - Natural England

#### Conclusion (ref 21/1672/LBC)

The planning application is accompanied by an application for listed building consent which must be assessed only in regard to the impacts on the listed building/s. As clearly outlined in this report there will be less than substantial harm to the significance of heritage assets as identified. Due to

the above, the decision maker must therefore weigh the harm against the public benefits of the scheme. An application can only be approved if the public benefits clearly outweigh the harm caused to the heritage constraints. Officers have demonstrated in the main body of the report that this will be the case.

For these reasons, the proposal is considered to constitute sustainable development and accords with the Development Plan. The material considerations have been fully considered and the application is therefore recommended for approval subject to the stated planning conditions.

RECOMMENDATION – Approve subject to conditions to include those listed below.

- Time Limit
- Approved plans
- Materials
- Architectural details

#### Informative

Removal of screen and plant enclosure if no longer required.

#### Recommendation:

The determination of this application falls within the scope of Officer delegated powers - YES / NO

Itheretor	e recommend the following:		
1.	REFUSAL		
2.	PERMISSION		
3.	FORWARD TO COMMITTEE		
This application is CIL liable		YES* (*If yes, comple	NO ste CIL tab in Uniform)
This application requires a Legal Agreement		YES* (*If yes, comple	NO ste Development Condition Monitoring in Uniform)
This application has representations online (which are not on the file)		YES	□NO
This application has representations on file		YES	□NO
Case Offic	cer (Initials):WT	Dated:	20/9/2021
I agree th	e recommendation: CTA		
Team Lea	nder/Head of Development Managem	ent/Principal P	lanner
Dated:	30/09/2021		
Head of application	Development Management has o	considered the	re contrary to the officer recommendation. The ose representations and concluded that the anning Committee in conjunction with existing
Assistant	Director, ECS (Planning & Transport	Strategy):J.	J
Dated:	05.10.21		
REASON	S:		

CONDITIONS:
INFORMATIVES:
INFORMATIVES.
UDP POLICIES:
OTHER POLICIES:
The following table will populate as a quick check by running the template once items have been entered into Uniform
SUMMARY OF CONDITIONS AND INFORMATIVES
CONDITIONS
INFORMATIVES