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Richmond Inn – Application ref 22/1496/FUL

**Neighbour Consultation Response**

This document provides a summary of public consultation responses that have been received in relation to application ref: 22/1496/FUL for the development proposals at Richmond Inn Hotel, 50-56 Sheen Road, Richmond, TW9 1UG.

Whilst 33 letters of objection have been received, these have come from only 26 separate households. The below table provides a summary of the objections that have been raised by public consultees, as well as a response to these objections. It should also be noted that there have been 11 letters of support received, as well as one observation from The Richmond Society, who are supportive of the proposed change of use but note that planning conditions should be imposed to mitigate neighbour concerns. Alongside neighbours, the letters of support are predominantly from local healthcare providers who are supportive of the proposed use.

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| **Consultation comment** | **Response** |
| Loss of the existing building | The proposed development seeks to demolish the non-original elements of the existing building, including the 1990s extension on Church Road and replace these with a new build element on Church Road and Sydney Road. KM Heritage have been involved throughout the design development process. From a heritage perspective, they consider that the 1996 extensions onto Church Road and Sydney Road are awkward in their execution with the hanging bay windows at the first floor level, an unsuccessful interpretation of a traditional Victorian feature found elsewhere on Church Road.  For this reason, KM Heritage conclude that the proposed development does not result in any harm to or loss of significance of any heritage asset. Rather it is considered that the proposals are appropriate and respectful to the building’s context, the setting and significance of the non-designated heritage asset on the site and will enhance the character and appearance, and better reveal the significance of, the Sheen Road Conservation Area.  This approach comprising the demolition and rebuild of the Church Road and Sydney Road elevations has been developed in discussions with Officers during the pre-application process.  The proposal is also accompanied by a Whole Life Cycle Carbon Assessment which provides further analysis and justification regarding the partial demolition of the building. The assessment demonstrates that the existing hotel building has high operational emissions due to the poor building fabric and obsolete plant. The proposed development, whilst resulting in higher embodied carbon values during the demolition and construction phase, would result in substantially reduced operational emissions which would over the life time of the building result in a reduction of embodied carbon value of 60% less than the existing building (by tonne of CO2e) and a carbon intensity value reduction of 74% (kg CO2e/m2 GIA). |
| Overdevelopment | Planning policy requires development to make the best use of land and requires site capacity to be optimised following a design-led approach. A number of pre-application meetings with Officers took place prior to submission where design amendments were presented and discussed – to follow a design-led approach. Positive feedback regarding the proposed design was received from Officers during pre-application discussions.  The proposal has been designed to preserve, and enhance, the heritage context. This includes the removal of insensitive modern extensions, and the creation of a series of sympathetic extensions which have been sensitively designed to respect the surrounding heritage assets as well as neighbouring properties. The proposals result in an improvement to the appearance of the existing building through removal of the untidy modern extensions and improvements to the façade treatment.  In the proposed scheme, the existing building on Sheen Road is retained in its proportions and massing. The proposals also include a new build extension on Church Road and Sydney Road. These elements will have shallow pitched roofs which are characteristics of the local area, and which will be set below the eaves level of the building on Sheen Road. Rebuilding this element has allowed for the floor levels to be set down in order to achieve a more subservient relationship to the original building on Sheen Road whilst maintaining viable ceiling heights within the building. The elevational design has also been progressed and includes the introductions of pavilions and bays to articulate the Church Road and Sydney Road elevations and break up the massing.  With regard to the number of rooms, whilst there is an increase in the number of bedrooms, the majority of rooms will be occupied by one person rather than two, given the type of use. |
| Heritage | The Site is located within the Sheen Road Conservation Area and in proximity to a number of statutorily listed buildings. The existing building facing Sheen Road is also designated as a BTM (locally listed building) and occupies a key corner plot on the intersection of Sheen Road and Church Road. KM Heritage have played a critical role in the design development of the emerging proposals to ensure that heritage and townscape considerations have been at the forefront of the scheme design.  Relationship with Building of Townscape Merit  The proposal includes the retention of the existing building on Sheen Road in its proportions and massing. The new build extensions on Church Road and Sydney Road have been sensitively designed having regard to the BTM on Sheen Road. These elements will have shallow pitched roofs which are characteristics of the local area, and which will be set below the eaves level of the building on Sheen Road. Rebuilding this element has allowed for the floor levels to be set down in order to achieve a more subservient relationship to the original building on Sheen Road.  Impact on Sydney Road Streetscape  The elevational design of the new build elements includes the introductions of pavilions and bays to articulate the Church Road and Sydney Road elevations and break up the massing. The proposals therefore result in an improvement to the appearance of the existing building through removal of the untidy modern extensions and improvements to the façade treatment.  In response to Design and Heritage Officer’s comments, the applicant has reviewed the location of the main Sydney Road entrance and the positioning of the doors and windows. The applicant has revised the lower ground floor plan and Sydney Road elevation to create a more symmetrical façade, and as such revised drawings have been submitted which will supersede the originally submitted drawings.  Impact on Conservation Area  The planning application is accompanied by a Townscape, Heritage and Visual Impact Assessment prepared by KM Heritage. This concludes that the proposed development does not result in any harm to or loss of significance of any heritage asset. Rather, it is considered that the proposals are appropriate and respectful to the building’s context, the setting and significance of the non-designated heritage asset on the site and will enhance the character and appearance, and better reveal the significance of, the Sheen Road Conservation Area. |
| Impact on neighbouring amenity | The proposed development includes the removal of insensitive modern extensions and the creation of a series of sympathetic extensions which have been sensitively designed to respect the amenity of neighbouring properties. The visibility of the proposed extensions from the neighbouring property will be limited due to the screening from the existing vegetation and boundary treatment. The proposed lower ground floor level sits beneath the existing ground level and the new development within the courtyard is below the fence line that separates it from the neighbouring properties and the extension does not project beyond the rear elevation line of the neighbouring building. The roof terrace previously proposed at pre-application stage has also been omitted to further protect neighbouring amenity.  Overshadowing  A series of technical assessments support the planning application, including a daylight sunlight assessment prepared by Anstey Horne. This concludes that the proposed development is in accordance with the BRE guidelines in terms of impact on neighbouring properties regarding daylight sunlight.  In accordance with the BRE guidance, the report also includes an assessment of sunlight to surrounding gardens at 34, 35 and 36 Sydney Road and 58 Sheen Road by plotting the two-hour sun contour on 21st March in the existing and proposed condition. The results confirm that the assessed gardens of the properties on Sydney Road adhere to the BRE guidelines and there is no material change with regards to overshadowing. There is a minor change to the rear garden of 58 Sheen Road, where there is a reduction in the area receiving 2-hours sunlight on 21st March by 23%, which narrowly exceeds the reduction of 20% suggested in the BRE guidelines. However, it should be noted that this amenity area already receives a low level of sunlight (with only 37% of the area receiving 2-hours sunlight on 21st March) due to the north facing aspect of the garden and nature of the surrounding existing buildings and trees. Anstey Horne therefore conclude that the proposed development would not significantly impact the use and enjoyment of this space compared to the existing situation.  Noise & Disturbance  A noise assessment has been prepared by Hoare Lea which includes an assessment of the noise impact from the proposed use in terms of external plant on surrounding receptors. This recommends plant noise limits to be followed that would provide suitable protection for all noise sensitive receptors to avoid any adverse impacts. In addition, a key objective of the Delivery and Servicing Management Plan is to minimise noise disruption from delivery and servicing movements during the operational phase.  Pollution  An Air Quality Assessment has been undertaken by Hoare Lea and accompanies the planning application submission and considers the potential impacts on local air quality associated with the construction and operation of the proposed development.  This concludes that the proposed development is air quality neutral in regard to both building emissions and transport emissions in line with the London Plan Guidance. This has been reviewed by the relevant Environmental Health Officer and LBRuT who has confirmed that no mitigation is needed. |
| Construction impacts | Traffic  Temporary arrangements for Sydney Road to be made two-way during the construction phase have been discussed and agreed with Highways Officers by way of a temporary traffic order. This removes the need for construction vehicles to drive around Sydney Road.  Noise & Disturbance  Furthermore, the Construction Management Plan includes details of the noise mitigation measures to be implemented during the construction phase to protect neighbouring amenity.  Air Quality  An Air Quality Assessment has been undertaken by Hoare Lea and accompanies the planning application submission and considers the potential impacts on local air quality associated with both the construction and operational phases of the proposed development. This concludes that the proposed development is air quality neutral.  The Construction Management Plan also includes specific dust mitigation measures to be implemented during the construction phase.  Some of the comments noted some inaccuracies in the submitted CMP. This has been amended and a revised CMP (titled ‘Revised Construction Management Plan’ and dated August 2022) has been provided to the case officer. There are no other inaccuracies in the remainder of the document. |
| Car parking | The Site has an excellent Public Transport Accessibility Level rating of 6a due to its proximity to Richmond Railway Station and a number of bus services. The Site also benefits from being located close to a network of footways.  The proposed use differs from a typical hotel in its operation as guest’s movements will largely be limited to arrival and departure. No guest staying at the facility will drive themselves to the site and will rather be dropped off in a private vehicle. At the end of their stay and depending on individual needs, guests leaving would either be picked up by a private car or taxi, or may choose to use public transport services. Because of this, there is no requirement for car parking spaces to be provided for guests. In addition, an off road drop off bay has been accommodated within the site to enable off street pick up and drop off of guests.  Due to the excellent accessibility of the site, staff and visitors would be encouraged to arrive by sustainable transport modes. Visitors would also be made aware of nearby car parks they could use if necessary and the operators hope to obtain designated spaces in the local car parks for this purpose. Where this is not feasible, visitors would be able to pre-book to use one of the two car parking spaces on site, which are proposed in response to comments received during the public consultation.  We note that a couple of the comments received query whether the courtyard can be reduced in size to accommodate more parking. In the first instance, planning policy encourages car-free development in highly accessible locations such as this and the provision of two car parking spaces therefore represents a significant improvement compared to the existing scenario in planning policy terms.  Moreover, the creation of a high quality, landscaped courtyard is central to the development proposals and seeks to create a garden of sanctuary at the heart of the development. A range of high-quality landscaping features are incorporated into the scheme including tree planting, green roofs, green walls and nature-based sustainable drainage. Accordingly, the scheme achieves an Urban Greening Factor of 0.375 which exceeds the London Plan target of 0.3 for non-residential development and a biodiversity net gain – both of which are required by planning policy, and significantly improves upon the existing Urban Greening Factor of 0.091  Comments were raised as to whether a basement car park could be provided. Building a basement would require a substantial increase in the construction time without much benefit for the project or local community. The increase in construction would increase disruption along Sydney Road. Moreover, from a sustainability perspective, basements are inherently carbon intensive to construct and providing underground parking on site encourages visitors to drive, which increase operational emissions of the hotel and traffic movements, as visitors are less likely to use more sustainable modes of transport. |
| Traffic congestion (operational phase) | In the operational phase of the development, trips to the centre will comprise:   * Guests arrival & departure * Visitors of guests staying at the centre * Staff movements * Servicing and deliveries   Guests  The proposed use differs from a typical hotel in its operation as guest’s movements will largely be limited to arrival and departure. No guest staying at the facility will drive themselves to the site and will rather be dropped off in a private vehicle. Guests will not be making trips to and from the site during their stay of approximately seven days. At the end of their stay and depending on individual needs, guests leaving would either by picked up by a private car or taxi, or may choose to use public transport services.  The applicant will be the end operator and will facilitate drop off and pick up of guests. This will allow timings to be managed at specific times and will minimise chance of congestion on Sydney Road by scheduling arrivals and departure times appropriately. It is anticipated the majority of guests will check in and out between the hours of 9am – 7pm. Drop-off and pick-up will be undertaken from within the Site in a dedicated loading bay accessed from Sydney Road.  Guests are anticipated to stay for an average of 7 days, therefore the turnover of guests will not be as high as a typical hotel where there are shorter stays. This therefore reduces the number of movements to and from the site.  Visitors  Guests may have visitors during their stay at the facility. Visitors will not turn up unannounced and will have to pre-book into a defined visiting session.  Due to the excellent accessibility of the site, staff and visitors would be encouraged to arrive by sustainable transport modes. Visitors would also be made aware of nearby car parks they could use if necessary. Where this is not feasible, visitors would be able to pre-book to use one of the two car parking spaces. During the booking liaison, the operator has the opportunity to provide visitors with directions from the local train station if travelling by train, or in the direction of the two local car parks. Throughout the booking liaison, the operator will communicate that the proposed development is a car free development and operators should only use local car parks as a last resort. In addition one of the onsite parking spaces will be able to be used by disabled visitors / staff.  In addition, the applicant has been in contact with private car parks to confirm arrangements for annual parking permits to be purchased to replace the removed existing parking bays on site. The number of permits will vary and will be dependent on the level of demand during operation of the site. These will be used in special circumstances and not publicly communicated for use of visitors to the proposed development.  The majority of visits to the site will take place between 10am – 1pm and 4pm – 7pm, with 17 visitors expected in each period respectively. It should be noted that these are multi-modal trips as detailed above.  Staff  Staff would be encouraged to arrive at the site by sustainable transport modes. To facilitate this, cycle parking is provided for staff in accordance with the London Plan requirements.  A Travel Plan has also been submitted as part of the planning application which seeks to raise awareness of sustainable travel modes available to employees, reduce the need for travel to and from the site, particularly during peak hours, and provide clear information to all employees on the transport available to them. These objectives will be achieved by introducing a package of physical and management measures that will facilitate travel by sustainable modes. This will include the appointment of a Travel Plan Coordinator.  If there is a staff member who is a blue badge holder, they will be given priority for use of the disabled parking space proposed as part of the development.  Servicing and deliveries  Servicing and drop-off will be undertaken from within the site in a dedicated loading bay accessed from Sydney Road. The servicing requirements and frequency will be similar to a 4-star hotel and therefore the proposed trips have been modelled on this basis. The servicing movements presented account for all servicing typically associated with a 4-star hotel including food deliveries.  Deliveries to the site will be undertaken by 4.6t light vans. The applicant will be the end operator and therefore has control over the types of servicing and deliveries to take place and will be able to make suppliers aware that 4.6t light vans are to be used. This includes refuse collection which will be undertaken by a private company. In the event a larger vehicle does turn up at the site (i.e. 7.5t box van) this could be accommodated within the proposed layby whilst still maintaining room for pedestrians on the footway.  Furthermore, the applicant will seek to ensure that deliveries take place at times outside guest/visitor arrivals and departures in order to avoid conflicts and reduce traffic congestion. Given the nature of the proposed use, delivery and servicing trips will be kept at a minimum.  During the construction phase Sydney Road will operate in a two-way fashion. Some comments have been received suggesting that the two-way access arrangement should be made permanent. The highways team have confirmed that due to the proposed development resulting in fewer trips compared to the previous development’s use, there is no basis to change the permanent operation of Sydney to be a two-way arrangement. |
| Removal of horse chestnut tree | There is a large horse chestnut located in the rear courtyard which is the subject of a TPO. This has been managed over many years and results in a generally poor formed canopy, with some unsympathetic pruning. It is generally surrounded by hard standing / block paving and the tree shows extensive signs of epicormic growth indicating the unfavourable growing conditions and constrained nature of its location. Moreover, whilst the tree does have presence in its location, it does have limited visibility from Sheen Road and Church Road. The proposed development seeks the removal of the existing tree.  A number of options for the scheme were explored during pre-application discussions. This initially included the retention of the existing building on Church Road and the introduction of a mansard roof on both elements of the existing building. The Council had concerns regarding the introduction of a mansard roof and the impact this would have on the proportions, form and appearance of the existing building, and wanted to ensure that the buildings on Church Road and Sydney Road remained subservient to the Sheen Road elevation. In light of these comments, the proposed development comprises the demolition of existing modern extensions and a new build element on Church Road and Sydney Road. This allows the floor levels to be set down in order to achieve a more subservient relationship to the original building on Sheen Road.  This design change necessitated the relocation of the hydrotherapy suite, which was originally proposed to be located as an extension to the rear of the BTM. Locating the suite here required a significant extension of the building at lower ground floor level to accommodate the spatial requirements. This then resulted in requiring a mansard roof to achieve acceptable floor to ceiling heights within this building, which the Council considered unacceptable. It should also be noted that, even in this option, the retention of the TPO was not guaranteed as the lower ground floor extension and refurbishment works to the existing Church Road elevation may have intruded into the root protection zone of the TPO.  A series of other options for locating the hydrotherapy suite were also explored. This included locating the suite at upper levels, which was ruled out due to the structural complexity, and locating the suite on Sydney Road. This was not taken forward as Sydney Road provides the only opportunity for vehicular access to the site. The proposed location of the hydrotherapy suite therefore represents the optimal solution for the site in terms of minimising additional structural works and providing an efficient internal layout.  The hydrotherapy suite is a key part of the proposed rehabilitation centre offering. Hydrotherapy aids recovery by increasing joint movement and increasing muscle strength, particularly so in guests who have undergone lower limb surgery that causes them difficulty mobilising and/or unable to fully bear weight. The inclusion of hydrotherapy is therefore integral to the service offering. The size of the suite has been calculated based on the number of rooms proposed in order to adequately cater for future guests.  The applicant has also explored options to relocate the tree within the site, but its age and condition makes this unviable. We therefore consider that the removal of the tree is unavoidable in order to accommodate the proposed development. Further detail of the design-work undertaken and various options tested is included within the Tree Justification Statement prepared by Greengage which supports the planning application.  We therefore request that the following considerations are taken into account when considering the loss of the tree:   * The tree to be lost is Category B, rather than a Category A tree * The scheme proposes the planting of 11 trees in total, a significant uplift on the existing position * Mitigation tree planting is proposed within the rear of the courtyard and along the Sheen Road frontage which in our view would provide sufficient replacement amenity value, and would indeed provide a greater contribution in terms of visibility along the streetscape * The mitigation planting and wider landscape proposals will increase the UGF of the site from 0.091 to 0.37 (exceeding the 0.3 target) * Biodiversity across the site will also be enhanced * A suitable scheme of maintenance and aftercare of the proposed trees can be secured via planning condition   In addition, the proposals will bring a vacant site back into economic use, and a use which would address identified health needs in the borough and beyond, we consider that there are clear planning benefits which outweigh the perceived harm which is considered to arise as a result of the proposed removal of the tree.  The tree officer advises that the CAVAT value of the tree would be £62,662, which would provide the baseline value of off-site tree planting (in addition to the delivery of replacement trees on site), which we propose could be secured via a financial contribution within the S106 Agreement. In our view the CAVAT payment and the on-site mitigation is sufficient to compensate the loss of the Horse Chestnut tree. |
| Financial benefit to local area | The proposed development will deliver a number of economic benefits to the local area. A full list of economic benefits of the proposed development, and how this compares to the current C1 use, is included within the Socio-Economic Assessment prepared by Lichfields. In summary:  Construction Stage   * An investment in the region of £12.1 million, supporting 88 FTE construction jobs and 129 indirect jobs associated this this phase * An overall economic contribution of £19.5 million per annum Gross Added Value (‘GVA’) during the construction phase   Operational Stage   * Support 61 FTE directly on site, and a further 30 FTE indirect jobs (these jobs would be a broader mix that a traditional hotel and will include opportunities in both hospitality and healthcare) * Generate up to £3.62 million in GVA each year * Potential generation of £121,100 each year in additional business rates revenue * Generate c.23,000 additional visitor stays in LBRuT (including c.5,300 stays by guests’ friends and relatives) which will drive further visitor expenditure in the local area (between £240,000 and £890,000 each year).   Wider Benefits   * Promoting local employment and training * Reduction in in unemployment, which could result in a social value contribution of c.£97,300 * Opportunities for local businesses / supply chain   The assessment provides a comparison between the socio-economic benefits of the proposals against the same metrics for two alternate scenarios. Firstly a return to operations as per the period leading to March 2020 (pre Covid-19 closure), and secondly the reopening of the hotel following refurbishment / update works to a 4 star hotel. The assessment concludes that the proposed development represents the highest economic and social benefit for the borough. |
| Lack of public consultation | Residents and businesses at over 1,100 addresses in the area surrounding the site received a newsletter on Thursday 10th March 2022 notifying them of two public consultation events. This also included a newspaper advertisement. These were held at the site on the evening of Thursday 24th March and morning of Saturday 26th March. In total, 54 residents attended the event across both dates.    A follow-up meeting then took place on 5th May at the site with residents of properties on Sydney Road, primarily to discuss concerns raised during the consultation regarding traffic, parking and construction disruption. Every address on Sydney Road received a hand delivered invitation for this session.    A number of amendments were made to the scheme in response to comments raised. This included the introduction of 2 car parking spaces, provision of a designated drop off area and the proposal to make a section of Sydney Road two-way during construction to remove the need for vehicles to use the remainder of Sydney Road.  The applicant has therefore engaged with local residents throughout the pre-application process, going above and beyond what would be expected. |
| Impact on property values in Sydney Road | This is not a material planning consideration in the determination of this planning application. |