



## PLANNING REPORT

Printed for officer by

Emer Costello on 14 July 2022

## Application reference: 22/1325/FUL

### FULWELL AND HAMPTON HILL WARD

Date application received	Date made valid	Target report date	8 Week date
25.04.2022	18.05.2022	13.07.2022	13.07.2022

**Site:**

3 - 4 New Broadway, Hampton Hill, ,

**Proposal:**

Ground floor conversion from commercial to two 1B1P self-contained dwellings. Single storey rear extension to accommodate one new 2B4P self-contained dwelling.

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

**APPLICANT NAME**

NBI (Holdings) London Ltd  
3 & 4 New Broadway  
Hampton Hill  
London  
TW12 1JG

**AGENT NAME**

K Rafferty  
183 Seafield Road  
Bournemouth  
Bournemouth  
BH6 5LJ

**DC Site Notice:** printed on and posted on and due to expire on

**Consultations:****Internal/External:****Consultee**

LBRUT Transport  
LBRuT Lead Local Flood Authority  
14D POL

**Expiry Date**

02.06.2022  
02.06.2022  
02.06.2022

**Neighbours:**

17 Church Street, Hampton, TW12 2EB -  
4 Falstaff Mews, Hampton Hill, Hampton, TW12 1LY, - 19.05.2022  
Flat 6, Prince House, 116 High Street, Hampton Hill, Hampton, TW12 1NT, - 19.05.2022  
Flat 5, Prince House, 116 High Street, Hampton Hill, Hampton, TW12 1NT, - 19.05.2022  
Flat 4, Prince House, 116 High Street, Hampton Hill, Hampton, TW12 1NT, - 19.05.2022  
Flat 3, Prince House, 116 High Street, Hampton Hill, Hampton, TW12 1NT, - 19.05.2022  
Flat 2, Prince House, 116 High Street, Hampton Hill, Hampton, TW12 1NT, - 19.05.2022  
Flat 1, Prince House, 116 High Street, Hampton Hill, Hampton, TW12 1NT, - 19.05.2022  
6A New Broadway, Hampton Hill, Hampton, TW12 1JG, - 19.05.2022  
6 New Broadway, Hampton Hill, Hampton, TW12 1JG, - 19.05.2022  
5A New Broadway, Hampton Hill, Hampton, TW12 1JG, - 19.05.2022  
5 New Broadway, Hampton Hill, Hampton, TW12 1JG, - 19.05.2022

4 New Broadway,Hampton Hill,Hampton,TW12 1JG, - 19.05.2022  
4A New Broadway,Hampton Hill,Hampton,TW12 1JG, - 19.05.2022  
3 New Broadway,Hampton Hill,Hampton,TW12 1JG, - 19.05.2022  
2A New Broadway,Hampton Hill,Hampton,TW12 1JG, - 19.05.2022  
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1A New Broadway,Hampton Hill,Hampton,TW12 1JG, - 19.05.2022  
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3 Falstaff Mews,Hampton Hill,TW12 1LY, - 19.05.2022  
118A - 118B High Street,Hampton Hill,Hampton,TW12 1NT, - 19.05.2022  
2 Grove Hill Villas,Hampton Road,Hampton Hill,Hampton,TW12 1JN, - 19.05.2022  
4 Grove Hill Villas,Hampton Road,Hampton Hill,Hampton,TW12 1JN, - 19.05.2022  
1 Grove Hill Villas,Hampton Road,Hampton Hill,Hampton,TW12 1JN, - 19.05.2022  
3 Grove Hill Villas,Hampton Road,Hampton Hill,Hampton,TW12 1JN, - 19.05.2022  
85 Connaught Road,London,TW11 0QQ - 19.05.2022  
FLAT 51,BUICK HOUSE 144,LONDON ROAD,KINGSTON UPON THAMES,KT2 6QS - 19.05.2022  
3A Grove Hill Villas,Hampton Road,Hampton Hill,Hampton,TW12 1JN, - 19.05.2022  
1 The Parade,Hampton Hill,Hampton,TW12 1JW, - 19.05.2022  
2 The Parade,Hampton Hill,Hampton,TW12 1JW, - 19.05.2022  
3 The Parade,Hampton Hill,Hampton,TW12 1JW, - 19.05.2022  
1 New Broadway,Hampton Hill,Hampton,TW12 1JG, - 19.05.2022  
118A High Street,Hampton Hill,Hampton,TW12 1NT, - 19.05.2022  
29 DONNINGTON ROAD,WORCESTER PARK,KT4 8EL - 19.05.2022  
FLAT 3,56 HOGARTH ROAD,LONDON,SW5 0PX - 19.05.2022  
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Flat 4,Prince House,116 High Street,Hampton Hill,Hampton,TW12 1NT, - 19.05.2022  
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 118A High Street,Hampton Hill,Hampton,TW12 1NT, - 19.05.2022  
 29 DONNINGTON ROAD,WORCESTER PARK,KT4 8EL - 19.05.2022  
 77 - 79A High Street,Hampton Hill, -  
 5 Hampton Road,Hampton Hill,Hampton,TW12 1JN -  
 FLAT 12,16 BINA GARDENS,LONDON,SW5 0LA -  
 Flat 2,85 Connaught Road,Teddington,TW11 0QQ -  
 5 Howard Close,Hampton,TW12 2UB -

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

#### Development Management

Status: GTD  
 Date:28/09/2018  
 Application:18/1948/FUL  
 Single-storey ground floor rear extensions (additional A1 (Retail floorspace)), new patio and boundary fence to rear of existing ground floor retail units.

#### Development Management

Status: GTD  
 Date:06/08/2020  
 Application:19/3704/FUL  
 Part single, part two-storey rear extension to allow the expansion of both ground floor retail / commercial units and the sub-division of the existing 3 bedroom first floor flat to form 2No. 1-bedroom flats and the construction of a mansard style roof extension to provide a further 2No. 1 bedroom flats at second floor level. Re-siting of existing front doors at ground floor level of the residential units.

#### Development Management

Status: GTD  
 Date:22/10/2020  
 Application:20/2395/VRC  
 Removal of condition no. 5 - U0081727 - Parking Permits Restriction - GRAMPIAN - Application Reference Number: 19/3704/FUL

#### Development Management

Status: REF  
 Date:11/02/2021  
 Application:20/3390/VRC  
 Variation of condition U0085786 (Approved Drawings) pursuant to planning permission 19/3704/FUL to allow inclusion of roof terraces to first and second floor flats and new rooflights to kitchen/living areas of second floor flats.

#### Development Management

Status: REF  
 Date:22/04/2021  
 Application:21/0724/VRC  
 Variation of condition U0089284 (Approved Drawings) of planning permission 20/2395/VRC to provide roof terraces and roof lights.

#### Development Management

Status: ARPR  
 Date:20/07/2021  
 Application:21/1726/GPD13  
 Conversion of A1 units to 2 x 1 bed apartments.

#### Development Management

Status: AAPR  
 Date:16/09/2021  
 Application:21/2665/GPD13  
 Proposed change of use from A1 (retail) units to 2No. 1 bed apartments C3 (residential) Use Class

#### Development Management

Status: REF  
 Date:22/03/2022  
 Application:21/3862/FUL  
 Demolition of existing garage and construction of single storey rear extensions to accommodate two new (1B1P) self-contained dwellings.

#### Development Management

Status: PCO  
 Date:  
 Application:22/1325/FUL  
 Ground floor conversion from commercial to two 1B1P self-contained dwellings. Single storey rear extension to accommodate one new

2B4P self-contained dwelling.

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**Building Control**

Deposit Date: 08.06.2022

Conversion of existing 2 commercial units and ground and first floor rear extension, entire 2nd floor extension to provide 7 flats

Reference: 22/1047/IN

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**Recommendation:**

The determination of this application falls within the scope of Officer delegated powers - YES

**I therefore recommend the following:**

- 1. REFUSAL
- 2. PERMISSION
- 3. FORWARD TO COMMITTEE

This application is CIL liable  YES\*  NO  
(\*If yes, complete CIL tab in Uniform)

This application requires a Legal Agreement  YES\*  NO  
(\*If yes, complete 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 Officer (Initials): EMC

Dated: 01.09.22

**I agree the recommendation: CTA**

Team Leader/Head of Development Management/Principal Planner

Dated: .....18/10/2022.....

This application has been subject to representations that are contrary to the officer recommendation. The Head of Development Management has considered those representations and concluded that the application can be determined without reference to the Planning Committee in conjunction with existing delegated authority.

Head of Development Management: .....

Dated: .....

**REASONS:**

<b>CONDITIONS:</b>
<b>INFORMATIVES:</b>
<b>UDP POLICIES:</b>
<b>OTHER POLICIES:</b>

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**

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#### **CONDITIONS**

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#### **INFORMATIVES**

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<b>Application Number</b>	22/1325/FUL
<b>Address</b>	3 - 4 New Broadway Hampton Hill
<b>Proposal</b>	Ground floor conversion from commercial to two 1B1P self-contained dwellings. Single storey rear extension to accommodate one new 2B4P self-contained dwelling.
<b>Contact Officer</b>	Emer Costello
<b>Target Determination Date</b>	EOT Not obtained

## 1. INTRODUCTION

This application is of a nature where the Council's Constitution delegates the authority to make the decision to Officers rather than it being determined by the Planning Committee.

Before preparing this summary report the planning officer considered any relevant previous planning applications in relation to the development and considered any comments made by those interested in the application such as consultees with specialist knowledge and nearby residents.

By indicating that the development proposal complies with relevant Local Plan Policies, the planning officer has considered the information submitted with the application, any previous relevant applications, any comments received in connection with the application and any other case specific considerations which are material to the decision.

## 2. DESCRIPTION OF THE SITE AND ITS SURROUNDINGS

The application site is the ground floor rear area of two Nos 3 – 4 units which are located on the southern side of New Broadway. The properties are mid terraced and two storeys in height. Unit 3 contains a sizable rear garage at the rear.

The ground floor retail elements received consent for a change of use to C3 residential via 21/2665/GPD13 on 16/09/2021. The change of use application has not been implemented.

The site is part of a small parade of shops which are designated as an Area of Mixed Use. It is subject to an Article 4 Direction Basements. The site is in a Critical Drainage Area - Environment Agency. The site is in Teddington Village. The site is in the Links View Road & Eastern End of Park Road Village Character Area 3 in the Hampton Hill Village Planning Guidance. The site is in the Fulwell and Hampton Hill Ward.

## 3. DESCRIPTION OF THE PROPOSAL AND ANY RELEVANT PLANNING HISTORY

3 – 4 New Broadway

21/3862/FUL Demolition of existing garage and construction of single storey rear extensions to accommodate two new (1B1P) self-contained dwellings. Refused Permission 21/03/202

### Affordable Housing

In the absence of a binding obligation securing an appropriate financial contribution towards the provision of affordable housing within the borough, the proposal would be prejudicial to meeting the Council's affordable housing objectives contrary to Policy LP36 of the adopted Local Plan (2018) and the adopted Supplementary Planning Document: Affordable Housing (2014).

### Design & Standard of Accommodation

The proposal, by reason of its backland siting, restricted layout and window positioning, unit numbers and area of site coverage, would represent a cramped and congested form of development that compromises the functioning of the existing ground floor commercial premises at the front of the site while also failing to provide an acceptable standard of residential accommodation by virtue of unsatisfactory outlook. It is therefore considered that the development would be contrary to Policies LP1, LP8 and LP39 of the adopted Local Plan (2018).

### Waste

Insufficient evidence has been submitted to demonstrate that suitably designed on-site facilities for the storage and collection of waste, refuse and recycling associated with the existing commercial units and the proposed residential development can be provided in compliance with Policy LP24 of the adopted Local Plan (2018) and Supplementary Planning Document: Refuse and Recycling Storage Requirements (2015).

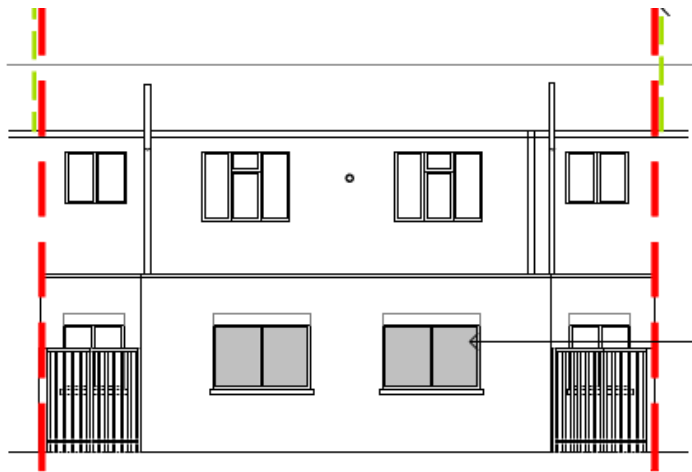


Figure x. Proposed Rear Elevation (this application)

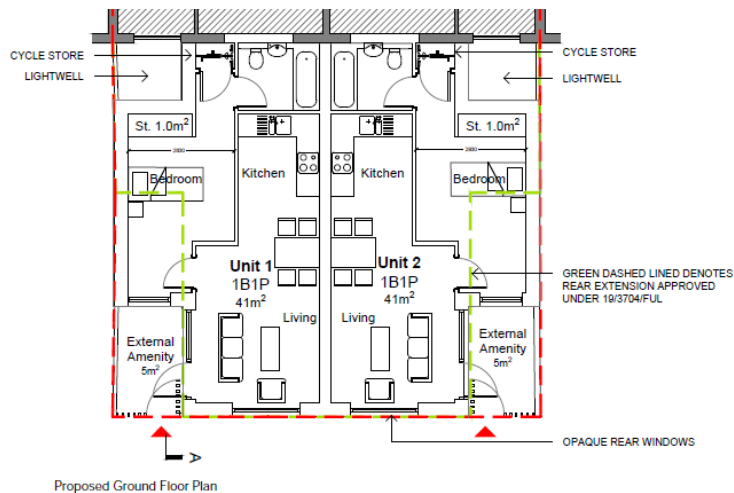


Figure x. Proposed Rear Elevation of Nos 3 – 4

21/2665/GPD13 Proposed change of use from A1 (retail) units to 2No. 1 bed apartments C3 (residential) Use Class Prior Approval Approved 16/09/2021 – This consent included a pre-occupation condition for DV18A - Refuse arrangements.

21/1726/GPD13 Conversion of A1 units to 2 x 1 bed apartments. Prior Approval Refused 20/07/2021

**Reason for Refusal:** Under Schedule 2, Part 3 M.2 (1) (a) (Transport and Highways) and M.2 (1) (b) (Contamination)) of the of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), prior approval is required and refused. The proposal would be contrary to the aims and objectives of LP45 and LP44 of the Local Plan (2018) and the London Plan (2021) T5 owing to its failure to provide cycle parking. The proposal has also failed to demonstrate that appropriate measures could be put in place to address potential land contamination on this site. The scheme would also fail to meet the Nationally Prescribed Space Standards (2015).

21/0724/VRC Variation of condition U0089284 (Approved Drawings) of planning permission 20/2395/VRC to provide roof terraces and roof lights. Refused Permission 22/04/2021

**Fire Safety:** In the absence of a fire safety strategy detailing the developments approach to fire safety risk, the scheme has failed to demonstrate that it would not have an adverse impact on the safety of future occupants in the event of a fire and is therefore contrary to the aims and objectives of Policy D12(A) of the London Plan (2021).

**Design:** The proposed roof terraces above the mansard roof, by reason of its combined design, scale and siting would result in an incongruous and unsympathetic form of development, presenting poor quality design, resulting in harm to the character and appearance of the terrace row and immediate area. As such, the proposal fails to comply with Policies LP 1 and LP 39 of the Local Plan (2018); Design Quality (2006) and Small and Medium Housing Sites (2006).

20/3390/VRC Variation of condition U0085786 (Approved Drawings) pursuant to planning permission 19/3704/FUL to allow inclusion of roof terraces to first and second floor flats and new rooflights to kitchen/living areas of second floor flats. Refused Permission 11/02/2021

**Neighbour impact:** The first floor terraces by reason of their siting provides a extensive platform allowing for levels of views into rear facing habitable room windows of, in particular,



Nos. 2 and 5 New Broadway resulting in harmful loss of privacy and enjoyment for the occupiers of these properties. As such the scheme is unsympathetic and unneighbourly and fails to comply with Policy LP 8 of the Local Plan (2018) and Small and Medium Housing Sites (2006)

**Design:** The proposed roof terraces above the mansard roof, by reason of its combined design, scale and siting would result in an incongruous and unsympathetic form of development, presenting poor quality design, resulting in harm to the character and appearance of the terrace row and immediate area. As such, the proposal fails to comply with Policies LP 1 and LP 39 of the Local Plan (2018); Design Quality (2006) and Small and Medium Housing Sites (2006).

20/2395/VRC Removal of condition no. 5 - U0081727 - Parking Permits Restriction - GRAMPIAN - Application Reference Number: 19/3704/FUL26/08/2020 Granted Permission 22/10/2020

19/3704/FUL Part single, part two-storey rear extension to allow the expansion of both ground floor retail / commercial units and the sub-division of the existing 3 bedroom first floor flat to form 2No. 1-bedroom flats and the construction of a mansard style roof extension to provide a further 2No. 1 bedroom flats at second floor level. Re-siting of existing front doors at ground floor level of the residential units. Granted Permission 06/08/2020



3D VIEW OF REVISIONS TO REAR

Figure 1. 3D view from Rear 19/3704/FUL

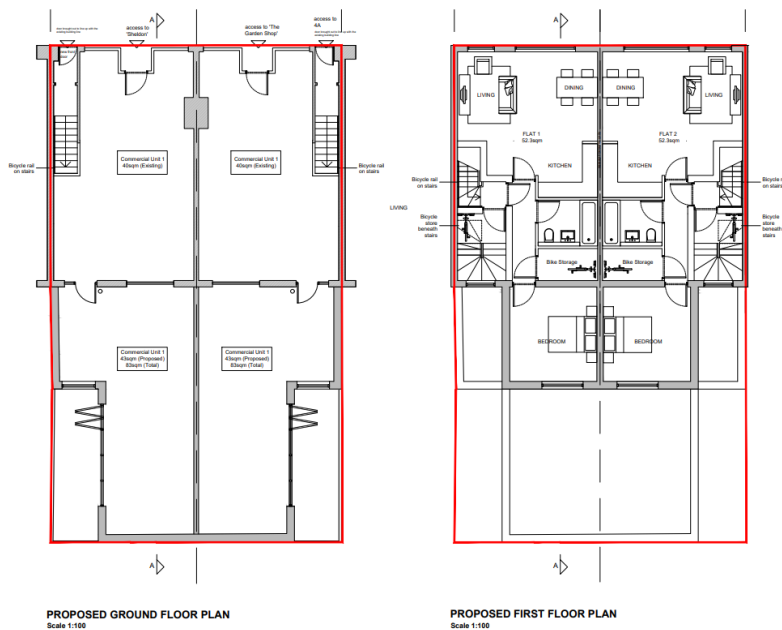


Figure 2. Proposed Ground Floor Plan 19/3704/FUL

18/1948/FUL Single-storey ground floor rear extensions (additional A1 (Retail floorspace)), new patio and boundary fence to rear of existing ground floor retail units. Granted Permission 28/09/2018

17/2957/FUL Formation of additional floor of accommodation in the form of a mansard style roof extension to facilitate the conversion of existing first floor 3 bedroom flat into 2x1 bedroom flats and provision of 2x1 bedroom flats at second floor level through the mansard roof; re-siting of existing front doors at ground floor level of the residential units and enlargement of first floor rear windows including new Juliet balconies. Granted 20.12.2017

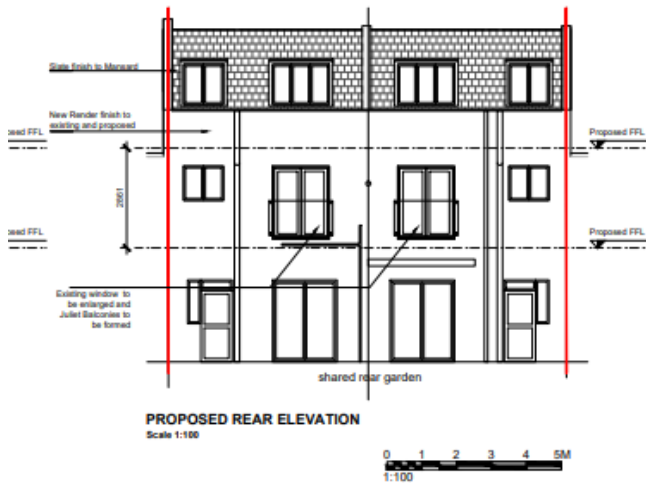


Figure 3. Proposed Elevation (17/2957/FUL)

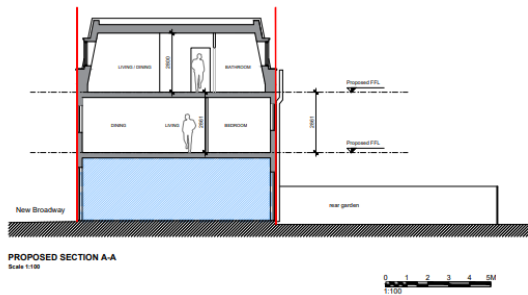


Figure 4. Proposed Section (17/2957/FUL)

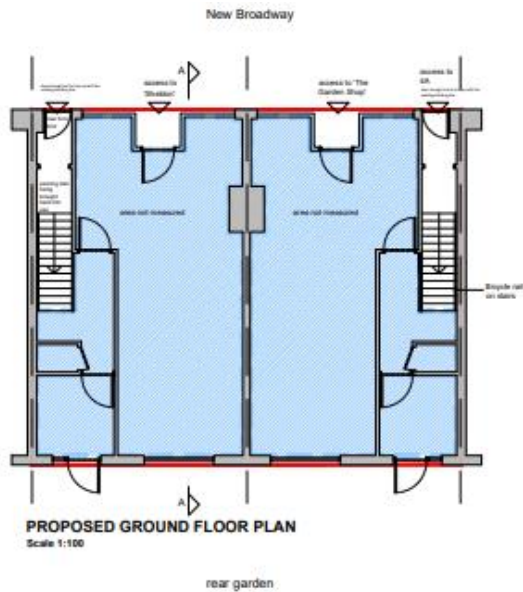


Figure 5. Proposed Ground Floor Plans 17/2957/FUL

16/4908/FUL Formation of additional floor of accommodation in the form of a mansard style roof extension to facilitate the provision of 1 no. 2 bedroom flat. Conversion of existing first floor 3 bedroom flat into 2 x 1 bedroom flats. Re-siting of existing front doors. Granted Permission 19/06/2017

16/0983/FUL Conversion of existing 3 bedroom flat into 2 x 1 bedroom flats. Appeal allowed 09/06/2017

No. 3 New Broadway Hampton Hill  
47/6514 Erection of garage. Granted Permission 28/10/1955

No. 4 New Broadway Hampton Hill  
77/0170 Use of ground floor only for professional office use. Granted Permission 27/04/1977

69/0172 Erection of single storey extension to form Sauna bath. Granted Permission 03/03/1969

**4. CONSULTATIONS CARRIED OUT**

1. 4 Falstaff Mews, Hampton Hill Hampton TW12 1LY
2. Flat 6, Prince House 116 High Street Hampton Hill
3. Flat 5, Prince House 116 High Street Hampton Hill
4. Flat 4, Prince House 116 High Street Hampton Hill
5. Flat 3, Prince House 116 High Street Hampton Hill
6. Flat 2, Prince House 116 High Street Hampton Hill
7. Flat 1, Prince House 116 High Street Hampton Hill
8. 6A New Broadway, Hampton Hill Hampton TW12 1JG
9. 6 New Broadway, Hampton Hill Hampton TW12 1JG
10. 5A New Broadway, Hampton Hill Hampton TW12 1JG
11. 5 New Broadway, Hampton Hill Hampton TW12 1JG
12. 4 New Broadway, Hampton Hill Hampton TW12 1JG
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14. 3 New Broadway, Hampton Hill Hampton TW12 1JG
15. 2A New Broadway, Hampton Hill Hampton TW12 1JG
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17. 1A New Broadway, Hampton Hill Hampton TW12 1JG
18. 2 Falstaff Mews, Hampton Hill TW12 1LY
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31. 118A High Street, Hampton Hill Hampton TW12 1NT
32. 29 DONNINGTON ROAD, WORCESTER PARK KT4 8EL
33. FLAT 3, 56 HOGARTH ROAD LONDON SW5 0PX
34. 85 Connaught Road, London TW11 0QQ
35. FLAT 51, BUICK HOUSE 144 LONDON ROAD KINGSTON UPON THAMES

No. 4 New Broadway contains Flat 4A above.

Adjacent properties are 5 & Flat 5A New Broadway to the east, 2 & Flat 2A New Broadway to the west. At the rear of the site the properties opposite are No. 1 & 4 Falstaff Mews. The list of neighbours notified of this application are listed above. Nine objections have been received.

<b>Public Comment</b>	<b>Officer Response</b>
Insufficient access	The units would be accessed off New Broadway through a communal corridor. This is acceptable.
Traffic generation/ congestion/car parking stress.	The proposed development would be car free. Evidence has been supplied to demonstrate that the development would not lead to an unacceptable level of car parking stress.
Unnecessary conversion to residential, the Council's is meeting its housing supply under the London Plan (2015)	The change of use is not supported owing the absence of suitable marketing.
Removal of existing garage unacceptable	The existing garage does not make a notable contribution to the rear of this site. There is no objection to its removal.
Detrimental impact on trade/local businesses along New Broadway. The current uses contribute to the vitality/viability of the area.	It is agreed that the change of use from commercial to C3 Residential could impact on the vitality and viability of this shopping parade.
Inappropriate development on garden land	There is no objection to the principle of a rear extension. the rear land is not used as a private residential garden at present.
Unacceptable loss of a valuable shopfront.	It is acceptable that the change of use would remove an active commercial

	frontage here which owing to the lack of marketing is not supported.
Poor design and layout/ destroy the character the area.	It is agreed that a residential unit could detrimentally harm the commercial character of the site and adjacent sites.
Inadequate materials	Were this application to be acceptable a condition would be applied securing details of materials.
Inadequate provision of amenity space	The quantum of amenity space provided for the 3 units is acceptable.
Important contribution to local employment in the area.	The site is part of a cohesive stretch of commercial units. In absence of marketing that there is no continued demand for a commercial use on this site, its change of use to residential is not supported.
The proposal would be overdevelopment of the site/to high in density	The principle of additional residential has already been established through previous consents on the site. See the Planning history section above.

The Hampton Hill Association and the Hampton Hill Business Association Town Centre Manager were of the 9 objectors who responded the Council's consultation.

### Community/Business groups

Hampton Hill Business Association Town Centre Manager	Vacancy rates are low in Hampton Hill. The existing premises are unique and valued businesses. The businesses are important to the vitality and viability of the High Street in general. Objection to allow for these to be redeveloped.	It is agreed that the change of use would be detrimental to the vitality of Hampton Hill High Street.
Hampton Hill Association	Contrary to the Shopfront SPD (2010). The shopfront is of high quality (Category A or B).	The site is not a protected shopfront. The shopfront would be on the whole retained albeit for minor changes.
Hampton Hill Association	The amenity space is substandard contrary to LP35.	The size requirements for amenity space under LP35 have been met.

Three letters of support have been received. The planning matters are summarised below.

- The proposal will provide small units which increase the rental offer in the area which is supported.
- The proposal is of a high-quality design.

It is noted that if the recommendation is an approval, Councillor Cardy has called this planning application in to Planning Committee.

<b>Consultees</b>	
LBRUT Transport	No objection to the principle of the development subject to a condition securing the details of refuse and recycling arrangements.
LLFA	Minor application so formal consultation with LLFA not required. Efforts should be made to manage surface water to prevent flood risk and added pressure to the existing surface water drainage network.

## **5. MAIN POLICIES RELEVANT TO THE DECISION**

### **NPPF (2021)**

The key chapters applying to the site are:

2. Achieving sustainable development Paragraphs 7 to 14
3. Plan-making Paragraphs 15 to 37
4. Decision-making Paragraphs 38 to 59
5. Delivering a sufficient supply of homes Paragraphs 60 to 80
6. Building a strong, competitive economy Paragraphs 81 to 85
7. Ensuring the vitality of town centres Paragraphs 86 to 91
9. Promoting sustainable transport Paragraphs 104 to 113
12. Achieving well-designed places Paragraphs 126 to 136
14. Meeting the challenge of climate change, flooding and coastal change Paragraphs 152 to 173
15. Conserving and enhancing the natural environment Paragraphs 174 to 188

These policies can be found at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1005759/NPPF\\_July\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf)

### **London Plan (2021)**

The main policies applying to the site are:

- GG1 Building strong and Inclusive communities
- SD6 Town Centres and high streets
- SD7 Town Centres: development principles and Development Plan Documents
- SD8 Town Centre network
- D4 Delivering good design
- D6 Housing quality and standards
- D12 Fire Safety
- E9 Retail, markets and hot food takeaways
- H1 Increasing Housing supply
- H2 Small sites
- H4 Delivering Affordable housing
- H6 Affordable Housing tenure
- H7 Monitoring affordable housing
- H8 Loss of existing housing and estate redevelopment
- H10 housing size mix

These policies can be found at: <https://www.london.gov.uk/what-we-do/planning/london-plan>

### Richmond Local Plan (2018)

The main planning considerations applying to the site and the associated Local Plan policies are:

Issue	Local Plan Policy
Local Character and Design Quality	LP1
Amenity and Living Conditions	LP8
Local Environmental impact, Pollution and Land Contamination	LP10
Biodiversity	LP15
Trees, Woodland and Landscape	LP16
Climate Change Adaptation	LP20
Flood Risk and Sustainable Drainage	LP21
Sustainable Design and Construction	LP22
Waste Management	LP24
New Housing	LP34
Housing Mix and Standards	LP35
Affordable Housing	LP36
Sustainable Travel Choices	LP44
Parking Standards and Servicing	LP45
Parking Standards	Appendix 3

These policies can be found at

[https://www.richmond.gov.uk/media/15935/adopted\\_local\\_plan\\_interim.pdf](https://www.richmond.gov.uk/media/15935/adopted_local_plan_interim.pdf)

### Supplementary Planning Documents

- Transport SPD (2020)
- Hampton Hill Village Planning Guidance SPD (2017)
- Government's Nationally Described Space Standard
- Design Quality SPD
- Planning Obligation Strategy SPD
- Sustainable Construction Checklist
- Residential Development Standards SPD (Incorporating Nationally Described Space Standards)
- Refuse and Recycling Storage Requirements SPD

These policies can be found

at: [https://www.richmond.gov.uk/services/planning/planning\\_policy/local\\_plan/supplementary\\_planning\\_documents\\_and\\_guidance](https://www.richmond.gov.uk/services/planning/planning_policy/local_plan/supplementary_planning_documents_and_guidance)

### 6. AMENDMENTS

None.

### 7. EXPLANATION OF OFFICER RECOMMENDATION

The key issues for consideration are:

- Loss of Class E
- Character and Design
- Neighbour Amenity
- Affordable Housing
- Housing Mix

- Residential Standards
- Amenity Space
- Highways and Parking
- Biodiversity
- Trees
- Sustainability
- Waste
- Flood Risk
- Fire Safety

### **Loss of Class E**

The NPPF Paragraph 86 sets out that

“86. Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Planning policies should:

(a) define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters;

(b) define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre.”

The London Plan Policy SD7 Town centres seeks to protect town centres. Policy SD8 outlines that “Local and neighbourhood centres should focus on providing convenient and attractive access by walking and cycling to local goods and services needed on a day-to-day basis.”

London plan Policy E9 outlines that Development Plans should “provide a policy framework to enhance local and neighbourhood shopping facilities and prevent the loss of retail and related facilities that provide essential convenience and specialist shopping”

The site is off Hampton Hill High Street and falls within an Area of Mixed Use. An AMU boundary delineates the smaller centres and parades in the hierarchy. There are a small number of centres which do not have such a boundary. In these locations proposals are expected to be located within or near to designated shopping frontages where the majority of commercial development is located.

Whilst it is recognised that consent to change these to residential has been agreed via the Prior Approval process 21/2665/GPD13 this has not been implemented, and the application has to be considered against the ‘current’ site conditions and development plan. **Article 4?**

A key consideration is if the residential use would prejudice the operations of the designated Area of Mixed Use. Under the Local Plan (2018) the existing Retail Class E(a) is protected unless a robust marketing exercise has been carried out in line with Policy LP 27 Local Shops and Services.

The residential conversion would remove the commercial element Class E from these units.

Policy LP 25 Development in Centres sets out that



“A. Development in the borough's centres, as defined in the centre hierarchy, will be acceptable if it: 1. is in keeping with the centre's role and function within the hierarchy and is of a scale appropriate to the size of the centre (also see the Spatial Strategy of this Plan); and 2. is in an appropriate location, as follows: a. A1 uses should be located within, adjacent to or well-related (or capable of being made so) to designated shopping frontages. b. For other appropriate uses (see B & C below), major development and/or developments which generate high levels of trips should be located within a Main Centre Boundary. Elsewhere development should be located within the defined Area of Mixed Use (AMU boundary). For centres, or parts of centres where no boundary exists, proposals should be well-related to designated shopping frontages. Proposals not in the above locations, including extensions to existing retail and leisure developments of more than 200sqm gross, should satisfy the Sequential Test as set out in national policy and guidance.”

Policy LP25 above sets out how all development in the Council's retail centres including AMUs are required to be 'in keeping with the Centre's role and function. Class E development is focused around the Council's existing town centres. This is considered detrimental the vitality of the Borough's retail centres.

The site is in the Hampton Hill Area of Mixed Use. Table 7.1.13 sets out that the its role and function is to:

- continue to be a thriving local centre with a range of shops and community facilities to meet local needs through a good balance of independent shops (as well as multiples) supported by sufficient convenient car parking;
- improve the appearance of buildings, particularly shopfronts, and the public realm;
- if possible reduce the impact of through traffic, enhance facilities for pedestrians and cyclists and manage parking;
- retain and improve the quality of shopfronts and advertisements; and
- improve highway conditions, signage and street furniture in the High Street.

The change of use to C3 would directly conflict with the role and function of the Hampton hill AMU.

The site is a retail frontage albeit not being formally designated. Notwithstanding this, provision is made for undesignated retail frontages under section F. Policy LP26 Retail Frontages outlines that Marketing requirements for changes of use “F. Where a proposal involves a change of use not supported by policy, the Council will require satisfactory evidence of full and proper marketing of the site. The applicant will be expected to undertake marketing in line with the requirements set out in Appendix 5.”

The change of use from Class E to C3 is not supported in this case. This application is not supported by a marketing exercise. As such the change of use on the ground floor from Class E to C3 is not considered acceptable against NPPF Paragraph 86, the wider aims and objections of London Plan Policies SD7 and SD8 and LP 25, LP26 and Appendix 5.

### **Character and Design**

NPPF (2021) Paragraph 134 sets out that “development that is not well designed should be refused, especially where it fails to reflect local design policies.”

Policy LP1 of the Local Plan 2018 seeks to maintain and, where possible, enhance the high architectural and urban design quality which contributes to the character and heritage of the area. Proposals should demonstrate:

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

Policy LP39 of the Local Plan 2018 states that infill and backland development must reflect the character of the surrounding area and protect the amenity and living conditions of neighbours. In considering applications for infill and backland development the following factors should be addressed:

1. Retain plots of sufficient width for adequate separation between dwellings;
2. Retain similar spacing between new buildings to any established spacing;
3. Retain appropriate garden space for adjacent dwellings;
4. Respect the local context, in accordance with policy LP2 Building Heights;
5. Enhance the street frontage (where applicable) taking account of local character;
6. Incorporate or reflect materials and detailing on existing dwellings, in accordance with policy LP 1 Local Character and Design Quality;
7. Retain or re-provide features important to character, appearance or wildlife, in accordance with policy LP 16 Trees and Landscape;

Guidelines from the 'Small and Medium Housing Sites' SPD state that new residential development must have regards to potential impacts on local character, plot layout and grouping, amenity and parking amongst others. Re-development of previously developed sites should only take place where the proposal does not have an adverse impact on the local character.

Minor alterations would be made to the front elevation on the ground floor. The doors would be moved to the centre of the two units. The windows would be opaque. The frontage would be timber framed. The fascia would be retained. There is no objection to this.

A single storey rear extension is proposed covering the rear width of both properties. The existing long rear garage would be removed.

The scale of the rear extension though significant in size, would not appear out of keeping with the typography of the architectural form at the back of these buildings which are commercial on the ground floor.

It is noted that 19/3704/FUL has been previously approved for a similar scale of rear extension at the back of the site. The overall bulk and mass of the proposal has been scaled back from 19/3704/FUL as it contains no first-floor addition.

However, the purpose and function of the rear additions were for commercial use/storage for 19/3704/FUL. The rear additions were basic and purely utilitarian. It is accepted that there can be no objection to the principle of rear addition here where they support the pre-existing character, role and function of this row of businesses.

However, introducing this as a residential scheme in this double rear extension is problematic. As opposed to a commercial extension, this would contain three outdoor amenity spaces for residential use and three primary windows looking out at the back of the site serving two bedrooms and a living area. It is noted that objections from adjacent and

neighbouring commercial premises have been received which are of the view a residential scheme would be incompatible with this business character and that it would forge an awkward relationship with the existing townscape. Aesthetically the change is at the rear of this site, with the alterations at the front being minor as discussed above.

The criteria under LP1 includes the specific requirement to demonstrate “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.”

The existing character at the back of the neighbouring units, is not a tidy/well-manicured spaces but functional commercial. Two residential units would be inconsistent with this. Its design would not be compatible with the commercial nature of this rear terrace of businesses.

It is considered that the rear extension (including its 3 amenity spaces and windows serving habitable rooms) to accommodate two 1 2 bed 4 person unit is contrary to LP1 and LP39.

### **Neighbour Amenity**

Policy LP8 states that development must protect the amenity and living conditions of existing, adjoining and neighbouring occupants. Design must allow for good daylight standards, avoid overlooking or noise disturbance, avoid visual intrusion, overbearing impacts or harm to the reasonable enjoyment of the uses of buildings and gardens. Harm may arise from various impacts such as noise, air pollution, odours or vibration.

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.

As approved under the planning permissions 17/2957/FUL and 19/3704/FUL, the proposal would create residential units however, this site would remove the commercial element.

#### **Nos 4A (Flat Above)**

The residential unit above is No 4A. It is not considered that the rear extension/3 new residential units would detrimentally impact on the amenity of this property particularly in terms of visual amenity, privacy or overlooking. The new units would be on the ground floor. It's design would not appear out of keeping with the rear gardens of the neighbouring properties which benefit from large rear garages.

#### **No 2 & 2A New Broadway**

No 2A New Broadway is located adjacent to the west. There is currently large garage in No.3's rear garden bordering the site. The replacement structure would not materially alter the relationship between properties in this regard. It would not contain side windows. The property would contain a rear amenity space along this border.

The above residential unit above would not be detrimentally impacted here. It is not considered that the proposed 3 residential units owing to the siting of windows and design would impact on the privacy or visual amenity of Nos. 2/2A to the west.

#### **No. 5 & 5A New Broadway**

No 5 New Broadway is located to the east. No. 5 gained consent for a rear extension in 1990 via. 096/FUL Single Storey Rear Extension. (Amendment: proposed Roof Height Lowered.)

Granted Permission 15/01/1990. This is of a commercial nature. There would be no side windows. It is not considered that the proposal would result in an adverse impact on No. 5A given its siting above.

Nos 1 - 3 Falstaff Mews, 1 Parkside, 3 Parkside & Flats No 1- 6 at 116 High Street Nos 1 - 3 Falstaff Mews to the south east and 1 Parkside, 3 Parkside at the rear to the south. Flats No 1- 6 at 116 High Street are sited a good distance away to the west. There would be circa 9.5m + of separation between the proposal’s kitchen/living space windows and the nearest flats at the back of this site. The closest 1 Falstaff Mews. The rear windows would be opaque. As such, it is not considered that the development would give rise to privacy impacts upon this or the surrounding properties.

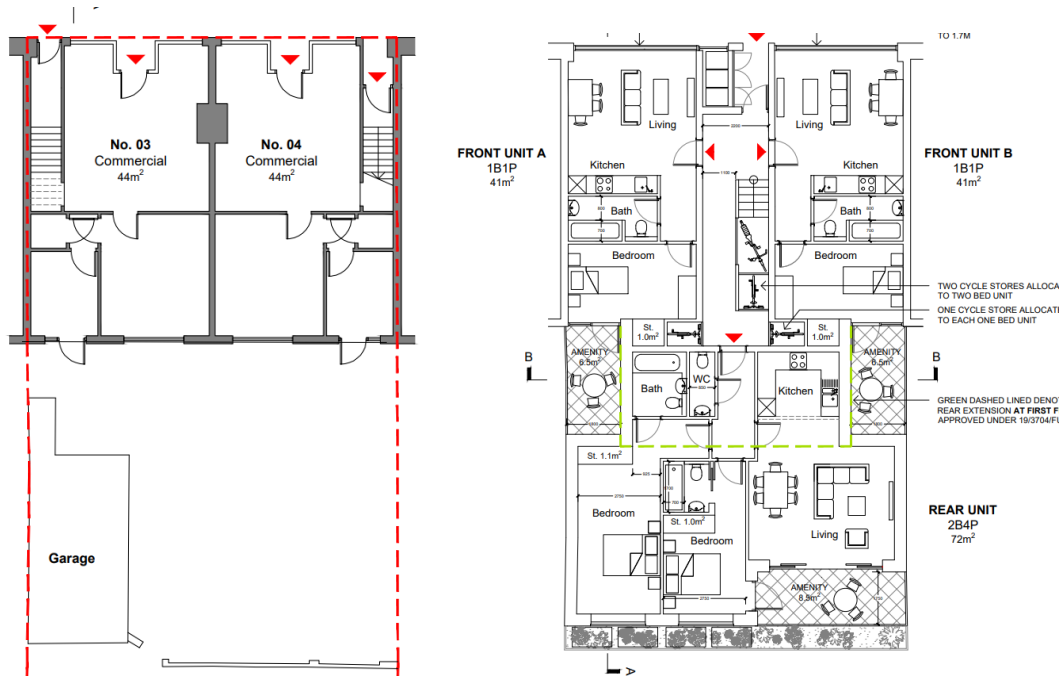


Figure 1. Existing and Proposed Site Plan

**Affordable Housing**

Local Plan Policy LP36 states some form of affordable housing contribution will be expected on all new housing sites. The Council will seek the maximum reasonable amount of affordable housing when negotiating on private residential schemes, further details are set out in the Affordable Housing SPD. The Council’s Viability Assessors Bespoke undertook a review of the Affordable Housing evidence dated August 2022. Bespoke have advised the Council that the proposal is not viable for affordable housing contributions.

**Housing Mix**

Local Plan Policy LP35 states that “development should generally provide family sized accommodation, except within town centres where a higher proportion of small units would be appropriate. Generally, the housing mix should be appropriate to the location.” The appropriate mix should be considered on a site by site basis. The proposal would provide 1 x 2 bed 4 person unit (as well as 2 x 1 bed , 1 person units) which could be accommodated a small family, as such there is no objection here.

## Residential Standards

Policy LP 35 (B) requires new housing to comply with the nationally described space standard. These are set out in the London plan Table 3.1 and the NDSS. The minimum standards are outlined below:

**Table 1 - Minimum gross internal floor areas and storage (m<sup>2</sup>)**

Number of bedrooms(b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) *			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	

The proposed units would be for:

- Unit A: 1 x 1 bed 1 person unit - 39sqm
- Unit B: 1 x 1 bed 1 person unit - 41sqm
- Rear Unit: 1 x 2 bed 4 person unit - 71sqm

These units would meet the minimum requirements. Policy LP35 sets out that “90% of all new build housing is required to meet Building Regulation Requirement M4 (2) ‘accessible and adaptable dwellings’. A condition will be applied to secure this.

There is concern that the rear bedrooms of units A & B would have limited light as their windows face out onto small amenity spaces. It is noted that a daylight/sunlight report has been provided by ‘the right to light consulting’ dated 17 May 2022. On the basis of the supplied information, the light into these bedrooms is considered tolerable. The rear unit would have a large window serving both the living area and the kitchen. There would be a dedicated window for each bedroom. This is considered acceptable.

Policy LP 8 Amenity and Living Conditions sets out that “all development will be required to protect the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties.”

Outlook is the visual amenity enjoyed by occupants when looking out of their windows or from their garden. The main outlook of the living space and rear bedrooms of the rear unit would be a commercial rear access track. It is considered that these levels of outlook would be completely unsatisfactory against LP8 here.

The proposal, 21/3862/FUL was refused on the grounds on the basis that the “Design & Standard of Accommodation” did not meet the requirements. The reason for refusal was stated: “by reason of its backland siting, restricted layout and window positioning, unit numbers and area of site coverage, would represent a cramped and congested form of development that compromises the functioning of the existing ground floor commercial premises at the front of the site while also failing to provide an acceptable standard of residential accommodation by virtue of unsatisfactory outlook. It is therefore considered that the development would be contrary to Policies LP1, LP8 and LP39 of the adopted Local Plan (2018).”

The commercial premises at the front has now been removed to make way for 2 x 1 bed apartments. It is considered that the development however would still be cramped and congested. The level of outlook of the rear flat would not be acceptable. Overall it is not considered that this reason for refusal has been fully addressed.

### **Amenity Space**

The requirements of Policy LP35 Housing Mix and Standards and the Residential Development Standards SPD continue to apply to external amenity space. The current Residential Development Standards SPD was adopted in March 2010 and sets out general guidance on amenity space. It seeks "a minimum of 5 sqm of private outdoor space for 1-2 person dwellings." Sufficient amenity space provision has been provided for each of the units.

Policy LP35 (d) sets out that amenity space should be "D. Amenity space for all new dwellings, including conversions, should be: a. private, usable, functional and safe; b. easily accessible from living areas; c. orientated to take account of need for sunlight and shading; d. of a sufficient size to meet the needs of the likely number of occupiers; and e. accommodation likely to be occupied by families with young children should have direct and easy access to adequate private amenity space." A Planning Statement (June 2022) and Design and Access Statement (May 222) have been provided. Units A & B would have circa 6.2sqm of amenity space and the rear unit would have 8.5sqm. This is acceptable. Additionally Bushy Park is in walking distance to the south of the site.

Details have not been provided to demonstrate that the amenity spaces would be of sufficient quality to serve the future occupants. Were this application to be acceptable, additional landscaping information would be required demonstrate that this space is of a reasonable quality, usable and functionable in line with LP35(d).

### **Highway and Parking**

Policy LP45, 3 states that 3. "Car free housing developments may be appropriate in locations with high public transport accessibility, such as areas with a PTAL of 5 or 6, subject to: a. the provision of disabled parking; b. appropriate servicing arrangements; and c. demonstrating that proper controls can be put in place to ensure that the proposal will not contribute to on-street parking stress in the locality. All proposals for car free housing will need to be supported by the submission of a Travel Plan."

Para. 11.2.3 also states "developers may only provide fewer parking spaces, including car free schemes, if they can demonstrate as part of a Transport Statement or Transport Assessment with supporting survey information and technical assessment that there would be no unacceptable adverse impact on on-street parking availability, amenity, street scene, road

safety or emergency access in the surrounding area, as a result of the generation of unacceptable overspill of on-street parking in the vicinity.”

#### *Car Parking*

The site has a PTAL of 2 and is not in a controlled parking zone (CPZ). There is an unsurfaced shared track leading from the southern side of New Broadway. According to the London Plan (2021) Car Parking Table 10.3, up to 0.75 car parking spaces should be provided per unit totalling 2.25 spaces.

The applicant has submitted a Transport Statement by Ardent Consulting Engineers dated 26 May 2022. The Council's Transport Officer accepts the view that the development would not lead to level of parking stress being pushed to a level above 85%.

Therefore, the Council's Transport Officer has no objection to a car free development here. Overall, it was considered that on-street vehicular parking stress within 200m walking distance of the site is well below the threshold of 85%.

#### *Cycle Parking*

Local Plan Policy LP45 states that new development should provide appropriate cycle access and sufficient, secure cycle parking facilities. The London Plan (2021) Car Parking Standards Table 10.2 sets out that a total of 4 cycle spaces should be provided. This aspect has been achieved. Fold up bike storage has been provided in the 1 bed flats and a space is also provided in the hallway. A condition will need to be applied however for further details of the cycle storage to ensure that this is usable and functional.

#### **Biodiversity**

Policy LP 15 Biodiversity sets out that the “Council will protect and enhance the borough's biodiversity. This will be achieved by “protecting biodiversity in, and adjacent to, the borough's designated sites for biodiversity and nature conservation importance (including buffer zones), as well as other existing habitats and features of biodiversity value.” Local Plan policy LP16, subsection 5 requires; "That trees are adequately protected throughout the course of development, in accordance with British Standard 5837 - Trees in relation to design, demolition and construction, Recommendations (2012).”

The principle of a large scale rear extension has been established on site via 19/3704/FUL. There were no biodiversity objections in these past consents. Given the existing site conditions, the lack of biodiversity enhancements is not considered to be a reason for refusal. Planting is proposed along the rear flat's boundary. This is welcomed.

#### **Sustainability**

Policy LP 10 stipulates that “the Council will seek to ensure that local environmental impacts of all development proposals do not lead to detrimental effects on the health, safety and the amenity of existing and new users or occupiers of the development site, or the surrounding land.” Policy LP 20 sets out that “new development, in their layout, design, construction, materials, landscaping and operation, should minimise the effects of overheating as well as minimise energy consumption.” LP 22 Sustainable Design and Construction sets out that all development that results in a new residential dwelling or unit including conversions, reversions, change of use and extensions that create one or more new dwellings need to meet the following standards: 35% reduction in CO2 emissions over Building Regulations (2013);

submit energy statement; achieve National water standards - 110 l/p/d; and Submit Sustainable Construction Checklist.

An Energy and Sustainability Statement has been supplied dated 25.04.22. A Sustainability Checklist has also been supplied on 19 May 2022. This sets out that the scheme will achieve a 35% reduction in carbon dioxide emissions over Building Regulations. This will be achieved by PV panels. The dwellings would also achieve a limit of up to 105 litres of water usage a day. The Water Calculator Report has been Supplied dated 19.08.21. The development will achieve the maximum internal water use of 104.47 litres per person/day by design. This meets the Council's requirements. The supplied evidence sets out that the development will achieve a 35% reduction in CO2 emissions (regulated) against a Building Regulations Part L (2013) by using photovoltaic panels. The application meets the requirements of LP10, LP20 and LP22.

### **Waste**

Policy LP24 sets out that "all developments, including conversions and changes of use are required to provide adequate refuse and recycling storage space and facilities." Policy LP24 and the Refuse and Recycling Storage Requirements SPD require adequate recycling and waste storage to serve each new unit. The Refuse and Recycling Storage Requirements SPD outlines that "kerbside recycling must be presented at the front edge of and within the property boundary and visible from the street on collection day."

Refuse and Recycling Storage Requirements SPD April 2015 sets out that for mixed use developments (i.e. commercial and residential), the commercial and residential waste must be stored and collected separately. The commercial waste storage area should be clearly separate from the storage area for residential waste, with separate access to each.

In the proposal, 21/3862/FUL the application was refused on the following waste grounds "Insufficient evidence has been provided to demonstrate that the waste and refuse could be adequately stored and serviced for the proposal, in particular the connecting commercial units at the front of the property on the ground floor. The proposal would therefore be contrary to LBRUT Local Plan (2018) Policy LP24 and the Refuse and Recycling Storage Requirements SPD (2015)."

The front hallway provides 1 x 360L refuse and 1 x 360L mixed recycling and 1 x 360L card/paper/cartons. The waste is located in the communal hallway at the front of the property. This is considered acceptable. The waste would be serviced off New Broadway. There is no objection to this. It is considered that this reason for refusal has been addressed.

### **Flood Risk**

LP 21 Flood Risk and Sustainable Drainage outlines that "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." The Council's LLFA has been consulted. A Drainage Strategy, by Mark Smith Architects dated April 2022 has been supplied. Drainage Information Report has also been submitted by Mark Smith Architects dated April 2022.



Were this application to be acceptable, a condition would need to be applied to ensure compliance with the supplied drainage information.

### **Fire Safety**

London Plan Policy D12 requires the submission of a Fire Safety Statement on all planning applications. The need for a fire statement became a policy requirement with the recent adoption of the new London Plan. Policy D12A states:

In the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety and ensure that they:

- 1) identify suitably positioned unobstructed outside space: a) for fire appliances to be positioned on b) appropriate for use as an evacuation assembly point
- 2) are designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire; including appropriate fire alarm systems and passive and active fire safety measures
- 3) are constructed in an appropriate way to minimise the risk of fire spread
- 4) provide suitable and convenient means of escape, and associated evacuation strategy for all building users
- 5) develop a robust strategy for evacuation which can be periodically updated and published, and which all building users can have confidence in
- 6) provide suitable access and equipment for firefighting which is appropriate for the size and use of the development.

A Fire Safety Statement dated December 2021 has been prepared by Mark Smith Architects dated April 2022. It is considered that this is adequate to meet the requirements of D12A.

The applicant is advised that alterations to existing buildings should comply with the Building Regulations. Where planning permission is granted, this would not equate to consent under the Building Regulations for which a separate application should be made.

## **8. LOCAL FINANCE CONSIDERATIONS AND OTHER MATTERS**

Section 70(2) of the Town and Country Planning Act 1990 (as amended) provides that a local planning authority must have regard to a local finance consideration as far as it is material. The weight to be attached to a local finance consideration remains a matter for the decision maker. The Mayor of London's CIL and Richmond CIL are therefore material considerations.

On initial assessment this development is considered liable for the Mayoral and Richmond CIL however this is subject to confirmation by the CIL Administration Team

This is to notify you that if this development receives planning consent it would be liable for a chargeable amount under the Community Infrastructure Levy Regulations 2010 (as amended by the Community Infrastructure Levy Regulations 2012).

## **9. RECOMMENDATION**

This recommendation is made following careful consideration of all the issues raised through the application process. For the reasons set out above, it is considered that the adverse impacts of allowing this planning application would significantly outweigh the benefits, when assessed against the policies in NPPF (2021) and Development Plan, when taken as a whole.

## Refuse planning permission for the following reasons

### Class E to Class C3 ~

Insufficient marketing evidence has been supplied to justify that there is no demand for a Class E Commercial Use on the ground floor units at 3 – 4 new Broadway. Given the absence of this information, change of use on the ground floor from Class E to C3 is not considered acceptable against NPPF Paragraph 86, the wider aims and objections of London Plan Policies SD7 and SD8 and LP 25, LP26 and Appendix 5.

### Affordable Housing ~

In the absence of a binding obligation securing an appropriate financial contribution towards the provision of affordable housing within the borough, the proposal would be prejudicial to meeting the Council's affordable housing objectives contrary to LBRUT Local Plan (2018) Policy LP36 and the adopted Supplementary Planning Document: Affordable Housing.

### Design & Standard of Accommodation ~

The proposed design of the three residential units would be over-cramped and fail to respect their immediate context along this row of Commercial Units (Class E). The rear unit would fail to provide an acceptable standard of accommodation, owing to the poor levels of outlook. The main outlook of the living spaces of the rear unit would be onto a rear access track which is not considered acceptable. It is considered the units are contrary to LBRUT (2018) Local Plan Policy LP1, LP8 and LP39.