



RIDGE

PLANNING STATEMENT: CHANGE OF USE
FROM OFFICE TO RESIDENTIAL AT
ONSLow HOUSE, 9 THE GREEN,
RICHMOND

FOR MS DAVIES AND MR MORTON
October 2023

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OCTOBER 2023

Prepared for

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1. INTRODUCTION

- 1.1 This Planning Statement has been prepared by Ridge and Partners LLP on behalf of Ms Davies and Mr Morton in support of their full planning application and application for listed building consent for the change of use of Onslow House, 9 The Green, Richmond, TW9 1PX to a single dwelling.
- 1.2 The purpose of this Statement is to set out the context for this application; describe the site location and the site itself; provide an assessment of the heritage interest, provide an analysis of the proposed development and the need for the proposal; set out the planning policy context and assess the extent to which the proposal complies with the Development Plan and other material considerations.
- 1.3 The Application seeks:
- “Change of use from Office (use class E) to a single residential property (use class C3)”.*
- 1.4 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, this Statement will appraise the policies contained within the Development Plan for the area and will address all other material considerations relevant to the development proposed, including the National Planning Policy Framework (NPPF).
- 1.5 In addition to this Planning Statement, and the detailed plans, the application is also supported by a Heritage Impact Assessment.

Statement Structure

- 1.6 This statement firstly provides a description of the application site and surrounding area in **section 2**, with details of the proposed development then provided in **section 3**. The relevant local and national planning policy is presented within **section 4**. An assessment of the material considerations pertinent to this proposal is given within **section 5**. A summary and conclusions provided in **section 6**.
- 1.7 This Statement should be read in conjunction with the plans prepared by Ridge and Partners LLP and the following documents that accompany the application:
- Existing and Proposed Floor Plans
 - Heritage Statement
 - Marketing Report
 - Traffic Survey
 - Site Plan

2. SITE AND SURROUNDING AREA

Site and Surrounding Area

- 2.1 The Site, Onslow House, is located on Green Road, Richmond. Onslow House is a 5 storey, Grade II listed building constructed in the mid eighteenth century for residential use. The building is constructed of load bearing solid masonry external walls with timber floors. There is a small garden to the front of the property and a larger one to the rear. There is also an original wine cellar.
- 2.2 The property is situated on southeastern side of Richmond Green, which is a conservation area, with views across The Green. The Green is edged by houses and commercial establishments.
- 2.3 Richmond is located in Southwest London. Richmond benefits from good public transport links and has numerous employment, retail and leisure amenities. Richmond has a thriving commercial centre attracting both local and international companies. Richmond station provides London Underground (District Line), Overground, and National Rail services (fastest journey time to London Waterloo – 19 mins). Heathrow Airport is also easily accessible, being approximately 13 miles to the west.
- 2.4 The property is bounded by wrought iron railings along its frontage which is a common boundary treatment associated with many of the properties in the immediate context of the Site. The property is accessed via steep steps to the raised ground floor or by steps to the lower ground floor. At the rear of the property there are also steep steps up from the lower ground floor and steps from the ground floor to access the garden to the rear. The steps used to access the building
- 2.5 Onslow House forms part of a terrace of Georgian properties, with adjoining and surrounding properties of similar architectural style and appearance.

Site Designations

- 2.6 Heritage Designations:
- Onslow House is a Grade II listed building.
- 2.7 Other Designations:
- The Site is partially located in the Key Office Area, however the boundary clearly excludes the building on the Site from this designation, with only the garden being in the Key Office Area. It appears that all buildings fronting the Green have been deliberately excluded from the Key Office Area.

- The Main Centre Boundary passes through the Site. Please refer to Richmond Borough Plan Policy LP 25.
- The Site is situated in the Archaeological Priority Zone
- The Site is in close proximity to Public Open Space
- The Site lies in close proximity to Metropolitan Open Land (MOL). MOL is strategic open land within the urban area that contributes to the structure of London. MOL is predominantly open land or water which is of significance to London as a whole, or to a part of London. There are restrictions on development on this land designation.

Planning History

2.8 There is no relevant planning history relating to the Site itself.

2.9 However, there is relevant planning history relating to the neighbouring site:

- Planning permission granted for Alteration Of Use: Upper Floors 1-3 To Residential Use. Ground Floor And Basement To Professional Rooms. Reopen, Move And Create Doorways at 10 The Green, Richmond- Ref Number: 94/0010/LBC

3. THE DEVELOPMENT PROPOSALS

3.1 This full planning application and listed building consent that seeks permission for the change of use from use class E Office Space to restore it back to its original use as a single residential dwelling, use class C3.

3.2 The current building has a gross internal area of 386.28m² which is not proposed to change if this planning application were to be approved.

3.3 The proposals aims to create a single family dwelling which involves non-intrusive re-ordering of the of the property by removing modern partitions and lobbies to restore the original plan form of the house to a notable degree at ground floor level.

4. PLANNING POLICY CONTEXT

4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section 70(2) of the Town and Country Planning Act 1990 requires that applications for planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise. This section provides an overview of relevant planning policy and guidance to the proposed development.

4.2 The Development Plan for the site comprises:

- Richmond Local Plan July 2018- 2033
- The London Plan March 2021

4.3 The Material Considerations relevant to the proposed development comprise:

- The National Planning Policy Framework
- Local Plan Update

Richmond Local Plan

4.4 **Policy LP1** requires all development to be high quality, in terms of both architectural and urban design quality. The policy lists a number of criteria new development will be assessed by. Some of these include ensuring that new development should be compatible with the local character of the area; be sustainably designed and constructed; make the best use of land using layout, siting and access; and ensure the suitability of uses.

4.5 **Policy LP 3 Designated Heritage Asset** 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. The significance (including the settings) of the borough's designated heritage assets, encompassing Conservation Areas, listed buildings, Scheduled Monuments as well as the Registered Historic Parks and Gardens, will be conserved and enhanced by the following means:

1. *Give great weight to the conservation of the heritage asset when considering the impact of a proposed development on the significance of the asset.*
2. *Resist the demolition in whole, or in part, of listed building. Consent for demolition of Grade II listed buildings will only be granted in exceptional circumstances and for Grade II* and Grade I listed buildings in wholly exceptional circumstances following a thorough assessment of the justification for the proposal and the significance of the asset.*
3. *Resist the change of use of listed buildings where their significance would be harmed, particularly where the current use contributes to the character of the surrounding area and to its sense of place.*
4. *Require the retention and preservation of the original structure, layout, architectural features, materials as well as later features of interest within listed buildings, and resist the removal or modification of features that are both internally and externally of architectural importance or that contribute to the significance of the asset.*

5. *Demolitions (in whole or in part), alterations, extensions and any other modifications to listed buildings should be based on an accurate understanding of the significance of the heritage asset.*
6. *Require, where appropriate, the reinstatement of internal and external features of special architectural or historic significance within listed buildings, and the removal of internal and external features that harm the significance of the asset, commensurate with the extent of proposed development.*
7. *Require the use of appropriate materials and techniques and strongly encourage any works or repairs to a designated heritage asset to be carried out in a correct, scholarly manner by appropriate specialists.*

4.6 **Policy LP8** states that all development is required to protect the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties.

4.7 **Policy LP 22 Sustainable Design and Construction** states:

A. *Developments will be required to achieve the highest standards of sustainable design and construction to mitigate the likely effects of climate change. Applicants will be required to complete the following:*

1. *Development that results in a new residential dwelling, including conversions, change of use, and extensions that result in a new dwelling unit, will be required to incorporate water conservation measures to achieve maximum water consumption of 110 litres per person per day for homes (including an allowance of 5 litres or less per person per day for external water consumption).*
2. *Proposals for change of use to residential will be required to meet BREEAM Domestic Refurbishment 'Excellent' standard (where feasible).*

B. *This should be achieved by following the Energy Hierarchy:*

1. *Be lean: use less energy*
2. *Be clean: supply energy efficiently*
3. *Be green: use renewable energy*

Retrofitting

C. *High standards of energy and water efficiency in existing developments will be supported wherever possible through retrofitting. Householder extensions and other development proposals that do not meet the thresholds set out in this policy are encouraged to complete and submit the Sustainable Construction Checklist SPD as far as possible, and opportunities for micro-generation of renewable energy will be supported in line with other policies in this Plan.*

4.8 **Policy LP 25 Development in Centres** provides an outline for development deemed as acceptable within development centres. It states the following:

- 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.
 - 3) does not adversely impact on the vitality and viability of the centre in which the development is proposed, or another centre. When assessing proposals for development outside of existing centres, applicants will have to comply with the requirements of national policy and guidance in relation to impact assessments. For retail developments, including extensions, of over 500sqm gross, the Council will require a Retail Impact Assessment. The scope of such assessments will need to be agreed with the Council before submitting a planning application; and
 - 4) 4. optimises the potential of sites by contributing towards a suitable mix of uses that enhance the vitality and viability of the centre. Commercial or community uses should be provided on the ground floor fronting the street, subject to other Local Plan policies, including the retail frontages policy LP 26.
- B. In addition to A above, the following applies to development proposals in the borough's five main centres:
- 1) The Council will support appropriate development (2) in the five main centres.
 - 2) The Council will encourage proposals for leisure, cultural and tourism facilities which contribute to the diversity of the offer.
 - 3) Proposals for A1 uses should include, where appropriate, units of a size suitable for modern retail needs (particularly in Richmond centre, where there is a shortage of retail units with larger floor-plates) whilst retaining sufficient traditional smaller units that add to the local character and which are important to local businesses.
- C. In addition to A above, in the local and neighbourhood centres as well as parades of local importance, the following applies:
- 1) Appropriate uses could include new retail (including markets), business or employment developments, which maintain suitable provision for small businesses, and other uses, which primarily serve the needs of the local community or attract visitors and develop cultural opportunities.

- 2) Development should, wherever possible, include overall improvements and enhancements of the small centres where appropriate, and/or modernise outdated premises.

4.9 **Policy LP 36** refers to affordable housing contributions. The policy states a contribution towards affordable housing will be expected on all housing sites. The following requirements apply:

- a) on all former employment sites at least 50% on-site provision. Where possible, a greater proportion than 50% affordable housing on individual sites should be achieved.
- b) on all other sites capable of ten or more units gross 50% on-site provision. Where possible, a greater proportion than 50% affordable housing on individual sites should be achieved.
- c) on sites below the threshold of 'capable of ten or more units gross', a financial contribution

No. of units proposed (gross)	% Affordable Housing		
	For conversions and reversions (where there is no loss of former employment floorspace.	For new build development or redevelopment (where there is no loss of former employment floorspace)	For any units replacing employment floorspace
9 units	36%	45%	90%
8 units	32%	40%	80%
7 units	28%	35%	70%
6 units	24%	30%	60%
5 units	20%	25%	50%
4 units	16%	20%	40%
3 units	12%	15%	30%
2 units	8%	10%	20%
1 unit	4%	5%	10%

to the

Affordable Housing Fund commensurate with the scale of development, in line with the sliding scales set out below and in the Affordable Housing SPD.

4.10 **Policy LP 40 Employment and local economy** states the Council will support a diverse and strong local economy outlining land in employment use should be retained in employment use for business, industrial or storage purposes.

4.11 **Policy LP 41 Offices** 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. They provide the following guidance on the retention of offices:

There is a presumption against the loss of office floorspace in all parts of the borough. Any loss of office space (on sites outside the designated Key Office Areas) will only be permitted where:

- 1. Robust and compelling evidence is provided which clearly demonstrates that there is no longer demand for an office based use in this location and that there is not likely to be in the foreseeable future. This must include evidence of completion of a full and proper marketing exercise of the site at realistic prices both for the existing office use or an alternative office-based use completed over a minimum period of two continuous years in accordance with the approach set out in Appendix 5; and then*
- 2. A sequential approach to redevelopment or change of use is applied as follows:*
 - a. Redevelopment for alternative employment uses including social or community infrastructure uses; followed by*
 - b. Mixed use including other employment generating or community uses and residential which maximises the amount of affordable housing provided as part of the mix; followed by*
 - c. Residential with maximum provision of affordable housing in accordance with policy LP 36 Affordable Housing.*

4.12 **Policy LP 45** states the Council will require new development to make provision for the accommodation of vehicles in order to provide for the needs of the development while minimising the impact of car based travel including on the operation of the road network and local environment, and ensuring making the best use of land. It will achieve this by:

- 1. Requiring new development to provide for car, cycle, 2 wheel and, where applicable, lorry parking and electric vehicle charging points, in accordance with the standards set out in Appendix 3. Opportunities to minimise car parking through its shared use will be encouraged.*
- 2. Resisting the provision of front garden car parking 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.*
- 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.*
- 4. Managing the level of publicly available car parking to support the vitality and viability of town and local centres within the borough whilst limiting its impacts on the road network.*

The London Plan

4.13 **Policy SD6 Town centres and high streets:**

The redevelopment, change of use and intensification of identified surplus office space to other uses including housing should be supported, taking into account the impact of office to residential permitted development rights and the need for affordable and suitable business space.

4.14 **Policy E1 Offices**

G. Development proposals related to new or existing offices should take into account the need for a range of suitable workspace including lower cost and affordable workspace.

H. The scope for the re-use of otherwise surplus large office spaces for smaller office units should be explored.

I. The redevelopment, intensification and change of use of surplus office space to other uses including housing is supported, subject to the provisions of Parts G and H.

4.15 **Policy H1** aims to increase housing supply within London to ensure ten-year housing targets within each borough are met.

4.16 **Policy HC1** concerns heritage conservation and growth, section C sets out that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

4.17 **Policy T6.1 Residential parking** states that a new residential development should not exceed the maximum parking standards set out in Table 10.3. These standards are a hierarchy with the more restrictive standard applying when a site falls into more than one category.

The Draft Local Plan

4.18 The Council are starting to prepare a new Local Plan for Richmond borough which will replace the current Local Plan and Twickenham Area Action Plan. The second publication of the new Local Plan was made available for consultation from 9 June to 24 July 2023. At the Full Council meeting on 27 April 2023, it was agreed to adopt and use the Publication Local Plan for development management purposes and determining planning applications, with the exception of Policy 39 and Policy 4, with appropriate weight given in accordance with paragraph 48 of the National Planning Policy Framework. It is expected the submission of the Local Plan to the Secretary of State to be later in 2023.

NPPF

4.19 **Paragraph 7** states the purpose of the planning system is to contribute to the achievement of sustainable development.

- 4.20 **Paragraph 8** states that the planning system has three overarching interdependent objectives in achieving sustainable development, an economic objective; a social objective and an environmental objective.
- 4.21 **Paragraph 9** states these objectives should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.
- 4.22 **Paragraph 10** states that at the heart of NPPF is a presumption in favour of sustainable development.
- 4.23 **Paragraph 11** states plans and decisions should apply a presumption in favour of sustainable development.

For plan-making this means that:

- a) *all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;*
- b) *strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*
 - i. *the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
 - ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

For decision-taking this means:

- c) *approving development proposals that accord with an up-to-date development plan without delay; or*
- d) *where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
 - i. *the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole*

- 4.24 **Paragraph 111** states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 4.25 **Paragraph 119** states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.
- 4.26 **Paragraph 120** states that planning policies and decisions should:
- a) *promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure)*
- 4.27 **Paragraph 123** states local planning authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs. In particular, they should support proposals to:
- a) *use retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors or sites or the vitality and viability of town centres, and would be compatible with other policies in this Framework; and*
 - b) *make more effective use of sites that provide community services such as schools and hospitals, provided this maintains or improves the quality of service provision and access to open space.*
- 4.28 **Paragraph 124** states that planning policies and decisions should support development that makes efficient use of land, taking into account:
- a) *the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*
 - b) *local market conditions and viability;*
 - c) *the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;*
 - d) *the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and*
 - e) *the importance of securing well-designed, attractive and healthy places.*

- 4.29 **Paragraph 194** states: *In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.*
- 4.30 **Paragraph 199** follows:
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.
- 4.31 **Paragraph 202** adds that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

5. PLANNING CONSIDERATIONS

Principle of Development

- 5.1 The principle of development at this Site is supported at both a national and local level, subject to the assessment of other material considerations.
- 5.2 Policy LP 40 of the Richmond Local Plan (RLP) states that the council will support a diverse and strong local economy and therefore land in employment use should be retained for business purposes. However, whilst this Site is partially designated as a Key Office Area, the Key Office Area boundary clearly excludes the building on the Site from this designation and therefore Policy LP 41 applies which states:

Any loss of office space (on sites outside the designated Key Office Areas) will only be permitted where:

- 1. Robust and compelling evidence is provided which clearly demonstrates that there is no longer demand for an office based use in this location and that there is not likely to be in the foreseeable future. This must include evidence of completion of a full and proper marketing exercise of the site at realistic prices both for the existing office use or an alternative office-based use completed over a minimum period of two continuous years in accordance with the approach set out in Appendix 5; and then*

2. A sequential approach to redevelopment or change of use is applied as follows:

- a. Redevelopment for alternative employment uses including social or community infrastructure uses; followed by
- b. Mixed use including other employment generating or community uses and residential which maximises the amount of affordable housing provided as part of the mix; followed by
- c. Residential with maximum provision of affordable housing in accordance with policy LP 36 Affordable Housing

5.3 A Marketing Report will be submitted as part of the application. In summary, no serious interest was generated in the commercial building from occupiers since the date of the original appointment. The Marketing Report also acknowledges the very large surplus of vacant office accommodation in the town. Thus in line with RLP Policy LP 41 after completion of a full and proper marketing exercise, it has been clearly demonstrated that there is no longer demand for an office based use in this location, and there isn't likely to be for the foreseeable future. Additionally, the Marketing Report highlights the challenges in complying with the Disability Discrimination Act due to the steps at the front of the building.

5.4 Paragraphs 120 and 123 of the NPPF reinforce the policy presumption in favour of development, by promoting the effective use of land in the redevelopment of underutilised properties in meeting the demand for residential dwellings. NPPF paragraph 124 supports the efficient use of land, specifically focussing on delivering the identified need for different types of housing. Given the above, it is clear the NPPF is in favour of the principle of development with regards to providing additional housing, especially through utilising disused buildings, which is the case for the Site.

5.5 RLP Policy LP 41 is further supported by London Plan (LP) Policy E2 which states:

Development proposals that involve the loss of existing B Use Class business space (including creative and artists' workspace) in areas identified in a local Development Plan Document where there is a shortage of lower-cost space or workspace of particular types, uses or sizes, should:

- 1) *demonstrate that there is no reasonable prospect of the site being used for business purposes, or*
- 2) *ensure that an equivalent amount of B Use Class business space is re-provided in the proposal which is appropriate in terms of type, use and size, incorporating existing businesses where possible, and include affordable workspace where appropriate*

5.6 As previously stated it has been demonstrated that the Site has no reasonable prospect of being used for business purposes and therefore complies with part 1 of LP Policy E2.

- 5.7 LP Policy SD6 states the redevelopment , change of use and intensification of identified surplus office space to other uses including housing should be supported.
- 5.8 LP Policy E1 supports the redevelopment, intensification and change of use of surplus office space to other uses including housing, subject to scoping for the re-use of otherwise surplus large office spaces for smaller office units as well as suitable workspace including lower cost and affordable workspace being explored before redevelopment. Whilst being marketed, the property offered a lower cost and affordable alternative office space, including very reasonable rent, as offices in close proximity were achieving much higher levels. Flexible leases were offered as well as incentives such as rent-free periods. Additionally, smaller office units were made available on a floor by floor basis and could have been used for numerous commercial uses subject to planning. Due to heritage and listed building constraints, the option to create an open plan, modern office space is not an option as such work would compromise the special interest of the building , reducing the interest from potential occupiers. Thus, complying with Parts G and H of Policy E1, ensuring Part I can be supported with the change of use of the building to a residential dwelling.
- 5.9 The LP outlines Richmond's 10 year housing target from 2019/20 to 2028/29 as 4,110, which lies within Policy H1 as it outlines the need to increase housing supply within London. Thus adding an additional dwelling to the housing supply will endeavour to help Richmond meet their 10 year housing target.
- 5.10 In line with Paragraph 69 the Site constitutes a small site which is important to contribute to the housing stock in the area. Small sites can be built out relatively quickly. Due to this Site being a conversion from office to residential, there should be no reason to believe the Site cannot be built out quickly, thus providing housing stock imminently.
- 5.11 Additionally, the Site constitutes a previously developed site and therefore is supported by Paragraph 119 which aims to make use of previously developed land.

Design and Heritage

- 5.12 A Heritage Statement has been completed in accordance with Paragraph 194.
- 5.13 In line with Paragraph 202 of the NPPF and Policy HC1 it is concluded in the Heritage Statement that the conversion of the Site from office to residential use is a notable heritage benefit due to the restoration of the building back to its original use. Thus also complying with Policy LP 3 which states that the change of use of listed buildings should be resisted where their significance would be harmed, however due to the history of the building, as outlined in the Heritage Statement, the proposals would reinstate the historic significance of the original dwelling.

- 5.14 Policy HC1 states development proposals identify enhancement opportunities by integrating heritage opportunities early on in the design process. In compliance with Policy HC1, heritage benefits at this Site include the removal of partitions and fire lobby to ground floor to restore the plan form, improving thermal efficiency through roof insulation, and potentially re-pointing the exterior to replace cement with hydraulic lime. The size and scale of the principal front reception room at ground level will be enhanced.
- 5.15 Additionally, it is proposed that existing windows and joinery will be retained, along with the hand made, mouth blown glass. This further complies with Policy LP 3 which outlines the requirement of retention and preservation of the original structure, layout, architectural features and materials.
- 5.16 Thus, in accordance with Paragraph 199 of the NPPF and Policy LP 3 great weight should be given to the proactiveness of the conservation of assets.
- 5.17 Policy LP 22 ensures developments achieve high standards of sustainable design and construction, incorporate water conservation measures and achieve high standards of water and energy efficiency. Proposals include upgrades to the buildings insulation, notably to the roof, to enhance the buildings efficiency and also to enhance the buildings long term conservation, without affecting the heritage values of the property, thus in accordance with Policy LP 22.
- 5.18 Policy LP1 requires all development to have high architectural and urban design quality. Proposals involving internal alterations include the removal of partitions and fire separation lobby to the entrance, which will reveal original architectural detail. The appreciation of original features and room proportions of the front reception room at ground level will also be enhanced. Additionally, modernisation, to upgrade the habitable quality of the building, will be introduced sympathetically to ensure impact on the historic architectural elements are minimised, ensuring quality design. Furthermore, the proposals will enhance the architectural interest of the Richmond Green Conservation Area due to the preservation of the buildings external features, as well as returning the building back to its original use.

Neighbour Amenity

- 5.19 Due to the proposal not making any external changes to the building, the proposal complies with RLP Policy LP8 which states that all development is required to protect the amenity and living conditions for occupants of adjoining and neighbouring properties. The residential use of the building is not going to lead to or compromise the amenity of surrounding properties or the future occupiers of the property.

Highway Matters

- 5.20 The Site is well connected to surrounding areas as Richmond is served by national rail, the London Overground and London Underground (District Line).
- 5.21 The Site also has good access to a number of local amenities, and is situated behind George Street, the main retail road in Richmond.
- 5.22 The Site has a Public Transport Accessibility Level (PTAL) rating of 6a. LP Policy T6.1 states new residential developments should not exceed the maximum parking standards set out in Table 10.3. Table 10.3 outlines the maximum parking provision for new dwellings located in all areas of PTAL 5-6 should be car free. Thus, whilst the proposed development is not for a 'new' residential dwelling, table 10.3 implies that no parking provision should be provided at the Site for the proposed change of use to residential.
- 5.23 As part of this proposal the applicant wishes to obtain 2 on-street residential parking permits. In compliance with Policy LP 45 an additional 2 cars is likely to have minimal impact and will be absorbed by the day to day highways traffic. Additionally, it is unlikely to impact the existing residential and public parking amenity, and therefore the application for on-street parking permits will not result in unacceptable parking stress within the area.
- 5.24 Thus according with Policy LP 45, Policy T6.1 and paragraph 111 of the NPPF the proposed change of use should not be refused or prevented on highways grounds.

Sustainable Development

- 5.25 The NPPF sets out at paragraph 7 that the purpose of the planning system is to contribute to the achievement of sustainable development. At paragraph 8 it sets out that there are three overarching objectives – economic, social and environmental, which are interdependent and need to be pursued in mutually supported ways.
- 5.26 Paragraph 10 of the NPPF states that in order for sustainable development to be pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (paragraph 11).
- 5.27 The Site helps to improve the economy by making use the best use of this property that was originally constructed as a residential property. Furthermore, the site has been marketed for 2 years without interest in its on-going use as office space and therefore reusing as a residential property is making use of this resource and future occupiers are likely to contribute to the local economy through future spend in the area.

- 5.28 The Site achieves Paragraph 8's environmental objective, Policy HC1 and Policy LP3 by ensuring the historic built environment is protected. The Heritage Statement outlines a net heritage benefit will be realised as an outcome of conversion of the Site back to its original use.
- 5.29 The social objective is achieved at the Site by increasing the housing stock available to residents to meet their needs. As well as the proposed dwelling being located near services and open spaces, such as Richmond Green.
- 5.30 Paragraph 126 of the NPPF is clear that the creation of high quality, beautiful and sustainable buildings is fundamental to what development should achieve. It states good design is a key aspect of sustainable development, it has been noted that the change of use of this dwelling ensures the restoration of the building back to its original use, maintaining key design features of the property such as the original fireplaces, dados rails, cornicing and skirting boards. Thus, complying with paragraph 126 and ensuring the development acceptable to the community.

6. CONCLUSIONS

7.1 This Planning Statement has been prepared by Ridge and Partners LLP on behalf of Ms Davies and Mr Morton in support of their full planning and listed building consent for the change of use with associated internal works at Onslow House, 9 The Green, Richmond, TW9 1PX to a single dwelling.

7.2 The Application seeks:

“Change of use from Office (use class E) to a single residential property (use class C3)”.

7.3 It is identified within this statement that paragraph 11(c) of the NPPF applies as development proposals that accord with an up-to-date development plan should be approved without delay. This sets out that planning permission should be granted for this Site.

7.4 The benefits and impacts identified within this statement can be summarised as follows:

Contributing Factor	Weight
Sustainable Development	Substantial (Benefit)
Neighbour Amenity	Neutral Impact
Design and Heritage	Significant (Benefit)
Principle of Development	Moderate (Benefit)
Highways Matters	Neutral Impact
Loss of Employment Floor Space	Neutral Impact

7.5 The overall package of benefits in this case are very significant indeed compared to the adverse impacts which are confined to the conflict with the Richmond Local Plan relating to the loss of office space, however the completion of a full and proper marketing exercise supersedes this policy conflict. Despite Policy LP45 suggesting car free housing developments may be appropriate in areas of a PTAL 6, the Parking Survey highlights the minimal impact the 2 parking permits would create, due to the existing low parking stress within the locale. As a result, the adverse impacts of granting planning permission would not significantly and demonstrably outweigh the benefits of the proposals. On the contrary the benefits in this case significantly outweigh the adverse impacts. Therefore, in accordance with NPPF paragraph 11 c), this application should be approved without delay.

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