



# 31 The Green

TW9 1LX

Design and Access Statement

Owners & Applicants: Mr Bailey and Mr Posner

Agent & Architect: Michael Jones Architects

Date: December 2023

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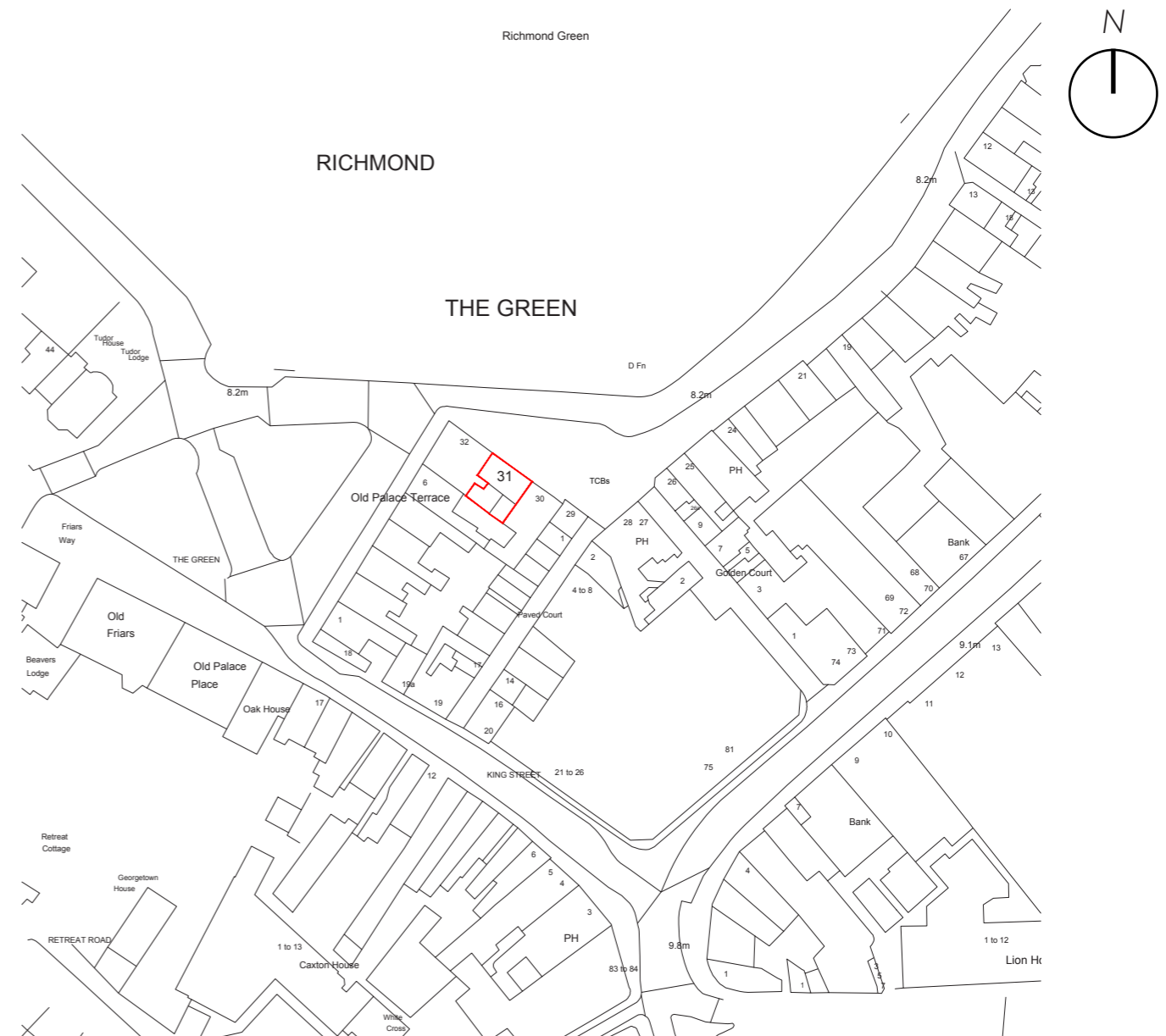
## 01. Introduction

This Design & Access statement makes the case for the proposed works to 31 The Green, a Grade 2 listed building dating back to the late 18th Century, accessed from the South-East of Richmond's historic green.

The property has undergone various internal and external alterations since its original construction, with little original details remaining internally. The proposed works look to reinstate the property back to its original use as a family dwelling through minor remodelling to the existing building, along with associated refurbishment and restoration works which will bring significant heritage and public benefits to the environment, listed building and the surrounding Richmond Green Conservation Area.



Bird's eye view of the property (curtilage in red)



Site location plan (not to scale, curtilage in red)







## 02. Site and Surrounding Context

### Listed Building

31 The Green, is a Grade II listed building and was first listed in 1950. Neighbouring properties no.30 and no.32 are also listed, with no. 30 being Grade II and No.32 being grade II\* listed.



*31 The Green, looking from the green*



*31 The Green looking from the Prince of Wales pub*



*31 The Green looking towards the Cricketers Pub*



### 03. Historical Chronology on Site

Local records indicate that 31 The Green, along with many other buildings surrounding Richmond's historic Green were constructed in late 18th Century after the demolition of the Royal Palace. The Local History Library indicates the earliest deeds to no.31 The Green, date back to 1863 and suggest that pre-1863 there was one previous owner and the building served as a family dwelling.

Architecturally, at the front, the building has remained largely unchanged since its construction and served as a family dwelling up until circa 1960, where local planning records show the building changed use into office space for an architects office. Local deeds support this, showing single name listings, rather than businesses up until this date.

Interestingly, at some point prior to 1960, no.31 and no.32 were joined and served as one building. Planning records for this work have since been lost, but a notable planning application in 1992 (see page 9) indicate that permission was granted for this party wall to be re-instated and both buildings to serve independently. As part of this planning application, permission was granted for the building to serve as a single family dwelling once again and local newsletters show evidence that the local community were very much in favour of this.

However since 1992, the building has continued to serve commercially, despite the dividing party wall being built and since 2014, the building has housed private bank, *Handelsbanken*, which has recently relocated to their new more accessible and modern office premises on 21 The Green.



Approach towards the South East corner of Richmond Green depicted by William PH Cottages



30, 31 and 32 the Green depicted in a water colour painting Circa 1901 by Fredrick Viner. The painting depicts no.31 as a dwelling covered in creeper vegetation and note that it also indicates a front gate to the property.



Image courtesy of Richmond Local Libraries centre - Image shows 31 The Green front elevation as a office building housing Manning and Clamp Architects.





Aerial Photo (c)Britain from Above - Image shows 31 The Green with a flat roof. Image Ref: EPW031989 dated 1928. (curtilage in red)



Photographs of street views showing 31 The Green. Dated 1947. (c) Historic England



Aerial Photo (c)Britain from Above - Image shows 31 The Green with a flat roof. Image Ref: EPW022842 dated 1928. (curtilage in red)



Photographs of street views showing 31 The Green. Dated 1960s. (c) Historic England





## 04. Statement of Significance

### Assessment of Significance

It is recognised that not all parts of a heritage asset will necessarily be of equal significance. In some cases, certain aspects or elements could accommodate change without affecting the Government's objective, which includes the conservation of heritage assets and which seeks to ensure that decisions are based on the nature, extent and level of significance of heritage assets.

Change is only considered to be harmful if it erodes an asset's significance. Understanding the significance of any heritage asset affected (*paragraph 189 of the NPPFs*) is therefore fundamental to understanding the scope for and acceptability of change.

An assessment of the significance of the grade II listed 31 The Green and the Richmond Green Conservation Area are provided below. In accordance with paragraph 189 of the NPPF, the descriptions are proportionate to the assets' significance and are sufficient to understand the nature of any impact the proposals may have upon that significance.

### 31 The Green

As a Grade II listed building, 31 The Green is a structure of significance which can be summarised as primarily deriving from a combination of its architectural and Historic interest.

Historic interest is from the history of the site with the existing building (at its original size) being built as part of the remodelling work to the Green after the demolition of the Palace in the late 18th century to reinstate this area of Richmond as a desirable place to live. It forms part of a larger assembly of buildings, ranging in architectural styles that form the surrounding boundary to the Green.

The front elevation of the building holds much architectural interest. The rows of proportionately sized and evenly spaced sash windows along with the grand entrance door, expressed with a brick archway are typical of a Georgian building from this era. It is a fine example of late 18th century terrace housing, with its brown brick complete with front railing and entrance steps directly abutting the pavement.

The rear elevation has undergone sizeable redesign since the original building, with timber cladding replacing the existing brickwork aesthetic and a rear conservatory constructed in 1972, later replaced with a larger rear extension in 1992. However, there are still features of architectural merit that are important to highlight and retain. The sash windows reinstated on the upper floors in 1992 are of even size and ratio and are positioned opposite those on the front elevation and therefore should be treated with the same care.

## 05. Planning History

There are a number of previous planning and listed building applications for 31 The Green. The most relevant applications are covered below:

Planning application number: 72/1847		
Proposal:	Replacement of existing rear window by glazed conservatory.	
Status :	Granted Permission	Date : 20/10/1972

Planning application number: 91/2234/FUL		
Proposal:	Separation From No 32 The Green By Closing Up Existing Openings In Party Wall, And Use Of No 31 As Single Family Dwelling House. Demolition Of Existing And Erection Of New Conservatory.	
Status :	Granted Permission	Date : 05/03/1992

Planning application numbers: 91/2234/LBC		
Proposal :	Internal Alterations Including Closing Of Existing Openings In Party Wall With No 32, New Staircase & Partitioning. Alterations To Rear Elevation At 2nd Floor Level. And Erection Of New Conservatory. Demolition Of Exist	
Status :	Granted Permission	Date : 05/03/1992

Interestingly this application was abandoned, despite getting planning permission. It holds significance in conjunction with the proposed application, as permission to change the use back into a single family dwelling was granted and local records show it was warmly welcomed by the local community.

Planning application number: 92/1623/FUL		
Proposal :	Office Refurbishment To Include Removal Of External Staircase And Conservatory, Construct Extension. Installation Of Boarding And New Window Layout On The Rear Elevation.	
Status :	Granted Permission	Date: 16/11/1992

This application is also relevant as it demonstrates the most significant building work to 31 The Green with the replacement of a 60's conservatory to a more substantial rear extension (see following pages).

Below are a number of relevant applications to other buildings surrounding the green that support the Change of Use from Class B1 Office spaces to Class C1 residential - some examples are listed chronologically below:

- Application no: 06/0865/FUL - No.15 The Green. Permission granted in 2006.

**- Application no: 09/0292/FUL - No.32 The Green. Permission Granted in 2009.**

- Application no: 09/28/93/FUL - No.21&22 The Green. Permission granted in 2009.

- Application no: 13/4340/FUL - No.17 The Green. Permission granted in 2014.

Below is an example of a refused application for a change of use from a medical surgery (use class D1) to residential (use class C3).

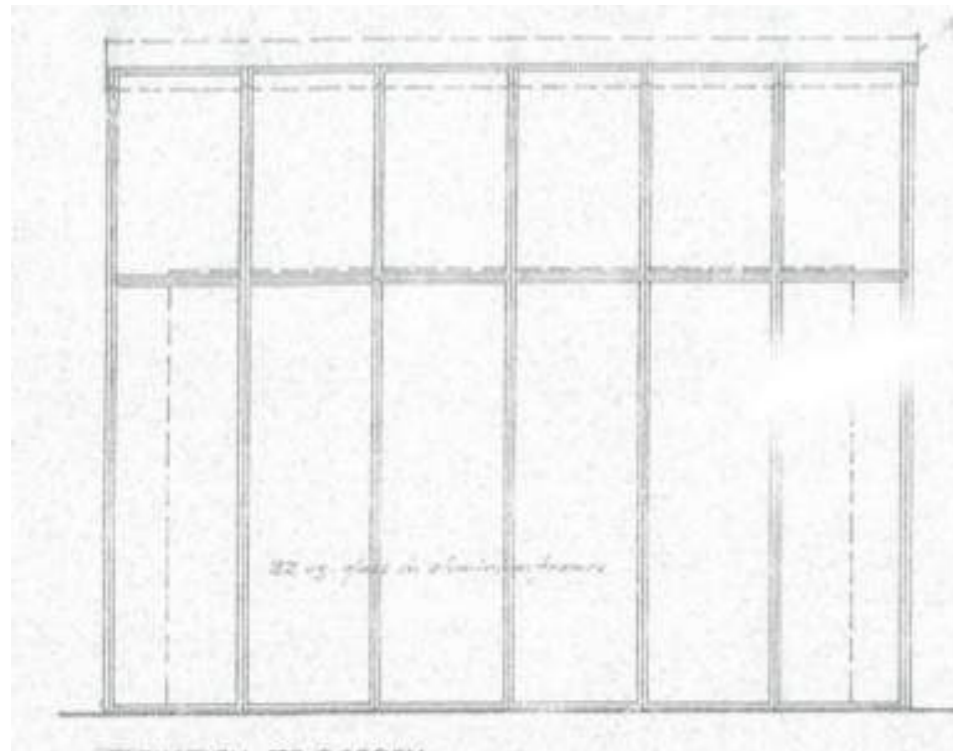
- Application no: 18/4268/FUL -No.19 The Green. Permission refused in 2019.

This application argued the building was insufficient to meet the current needs, including conformity with health and safety standards as a doctors practice, therefore justifying a change of use back to dwelling. Interestingly, the officers report broadly accepted this principle and that 'there is support for using buildings for their original purpose' and agreed that 'the facilities no longer meet the need for the users and cannot be adapted'. However, the lack of justification for the removal of historic fabric and the loss of the buildings heritage assets was a key driver in the building being refused for the change of use.

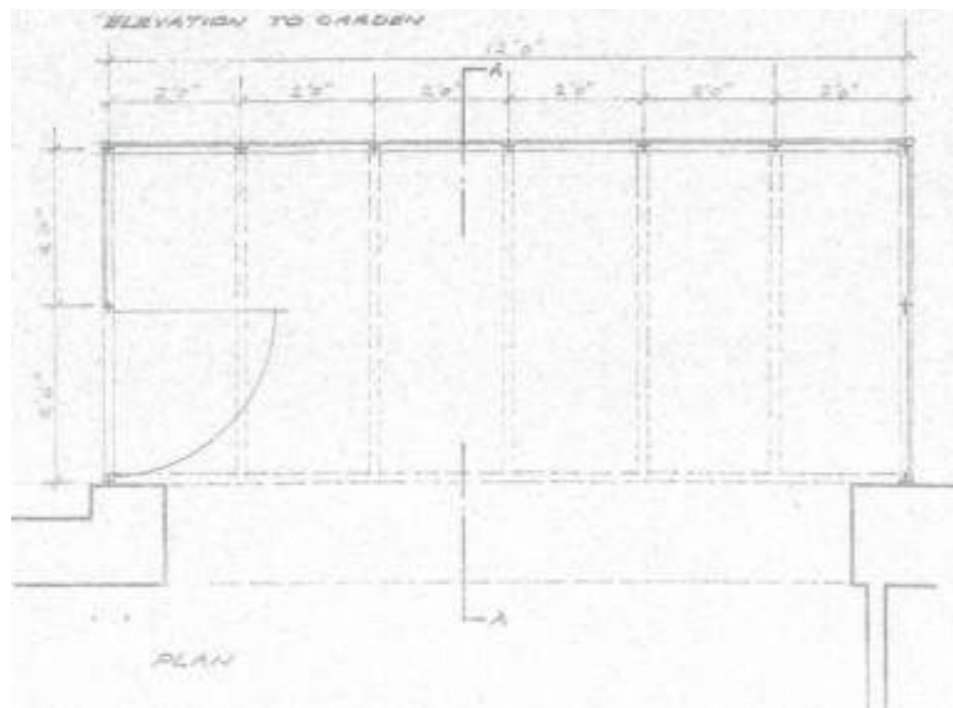
In 2005 another application for a Change of use from residential to offices, application no. 05/2297/COU was refused on the grounds that this was 'a loss of residential use' to The Green. Which again supports the argument for residential developments on Richmond Green.



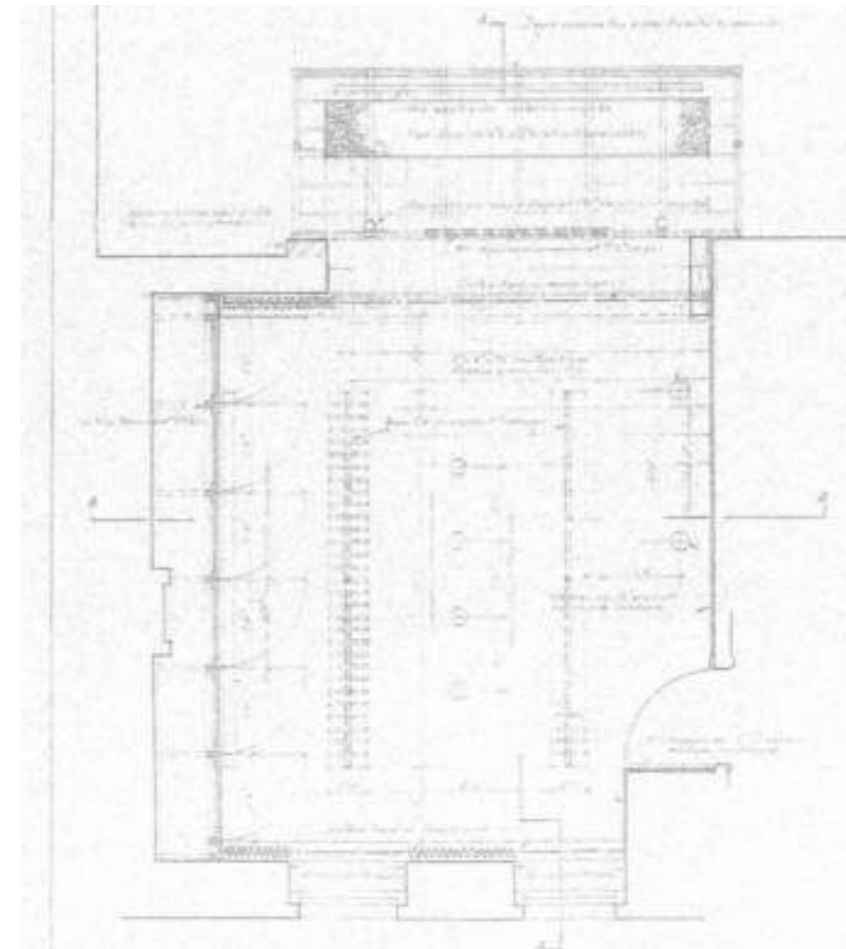
The following drawings are from the 1972 application 72/1847



Elevation of proposed conservatory



Part plan of proposed conservatory



Proposed plan of no.31 the Green

These drawings are the earliest available from the planning department. They indicate the first significant change to the historic fabric of the building with the partial demolition of the back south wall to the rear courtyard of the building to construct the small rear conservatory.



The following drawings are extracted from a 1991 estate agent brochure, showing no.31 and 32 as one building

The below extract is from a 1991 newspaper article written by the chairman of the Richmond Society, that welcomes the opportunity for no.32 and subsequently no.31 changing back to residential use.

**Make this a home once more** RTT.3.1991

Sir—Some readers may have noticed that No's 31 and 32 The Green, Richmond were advertised for sale in the Commercial Property Section of this newspaper in last week's issue.

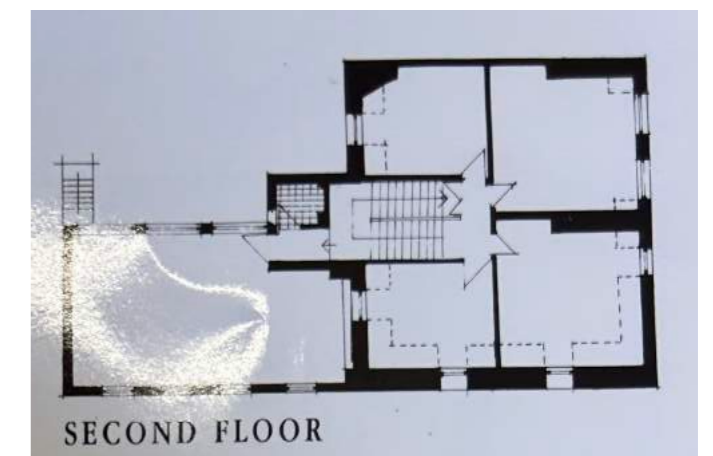
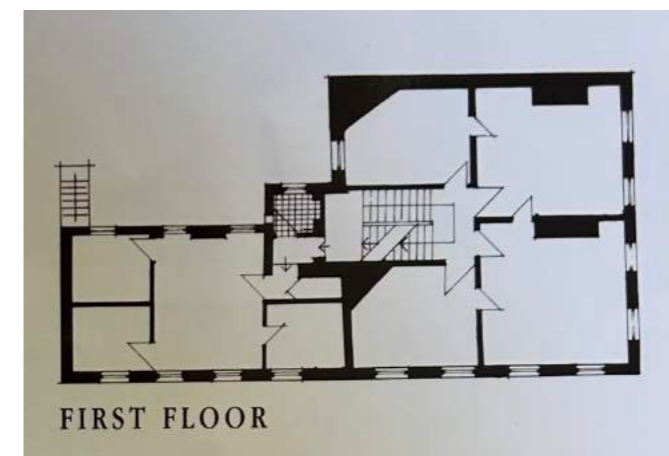
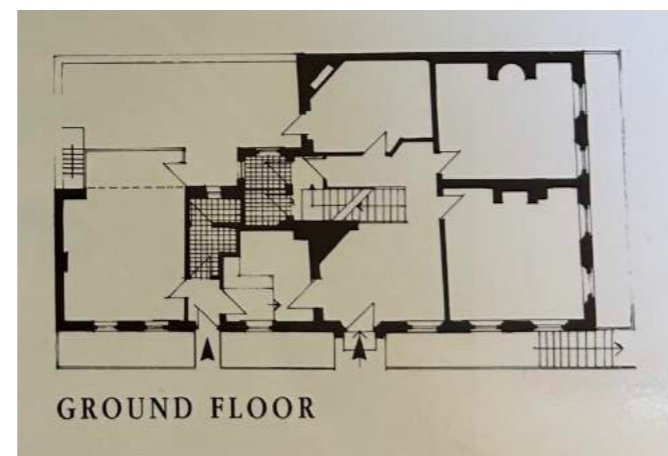
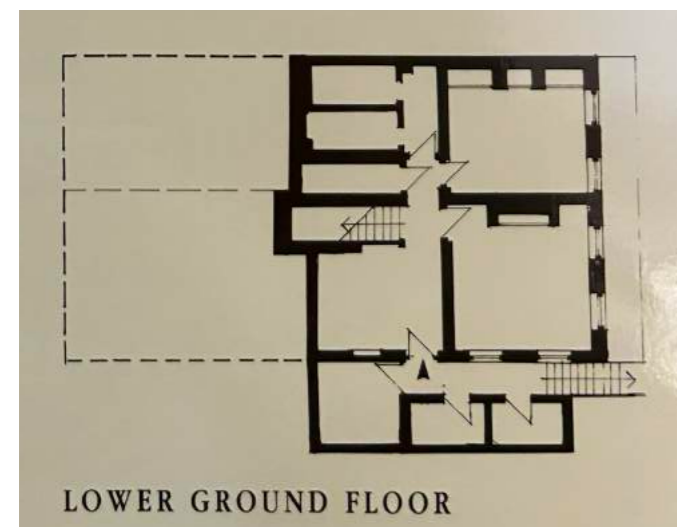
The Richmond Society would like to point out that applications for the continuation of BI use for these properties were refused by the council in November 1990.

Currently the owners have renewed the applications in more specific form i.e. "continuation of BI office use", but the authority has not yet reached a decision on them. The society believes strongly that these late 17th/early 18th century houses should be returned to residential use.

Their occupation by one professional firm for the past 25 years has now come to an end. The opportunity to resume their original function could be taken, provided that office permission is withheld. It is hoped that in the future any advertisements concerning these buildings will be unequivocally in the residential category.—Liz Carran, Chairman, The Richmond Society. Richmond letter



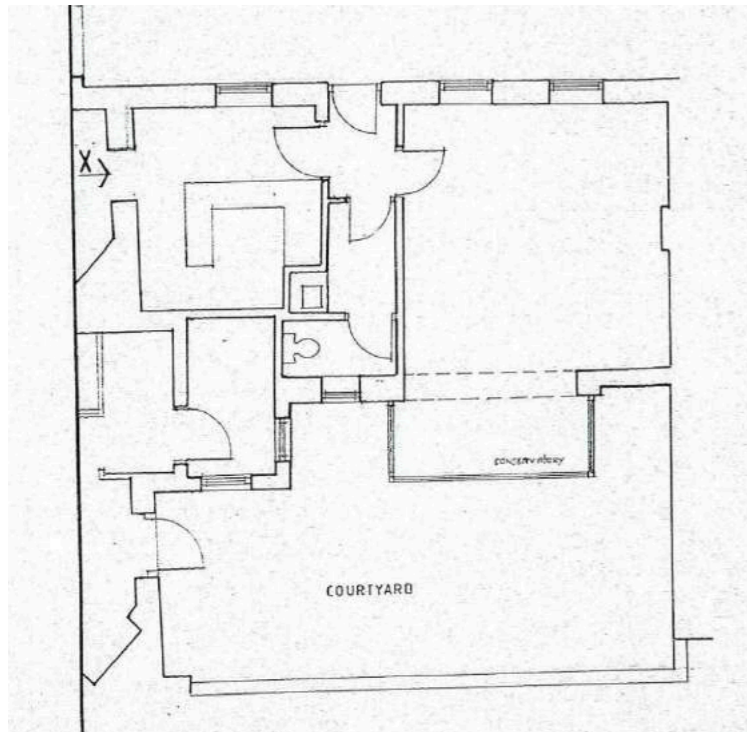
During the same year, 1991, the property was put up for sale as a house and the plans demonstrate how both no.31 and no.32 formed one building.



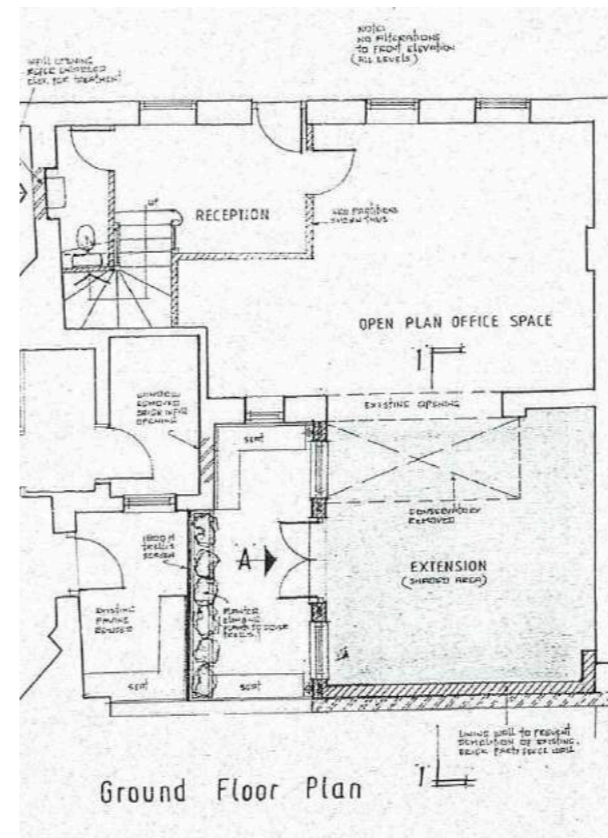
The plans show additional partitions that join the two buildings together, which have since been removed when the party wall between them was erected. These older layouts demonstrate more internal works that have happened to the building since its original construction. A notable difference between these plans and the existing plans to date (see page 12) is the additional modern staircase that was added to no.31 when the two buildings separated.



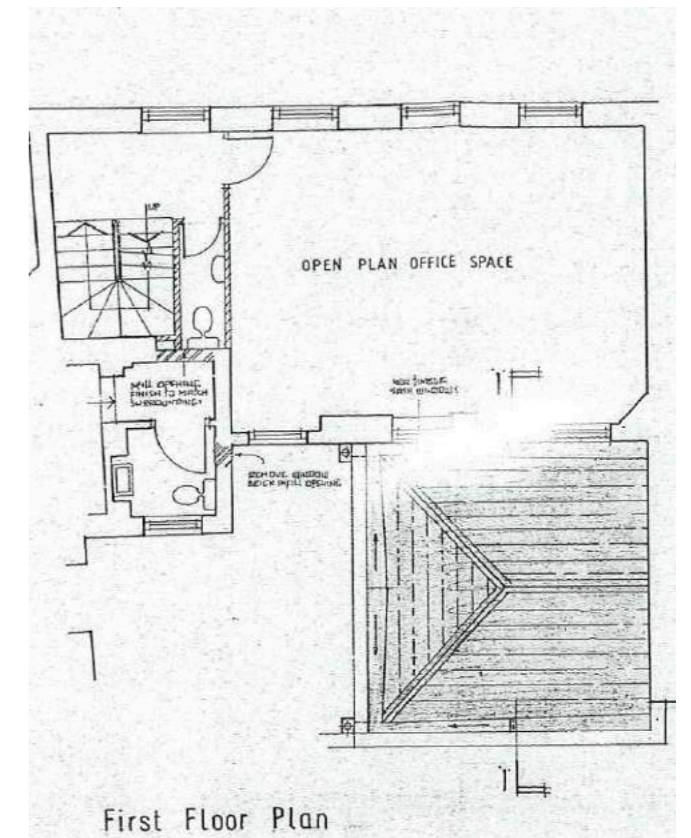
The following drawings are from the refused 1992 application 92/11029/FUL



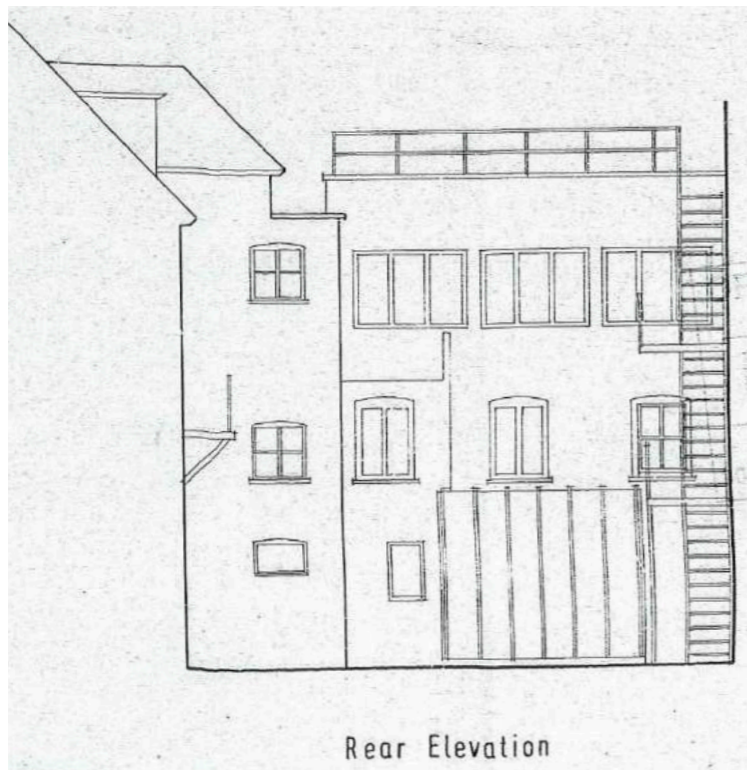
Existing ground floor plan



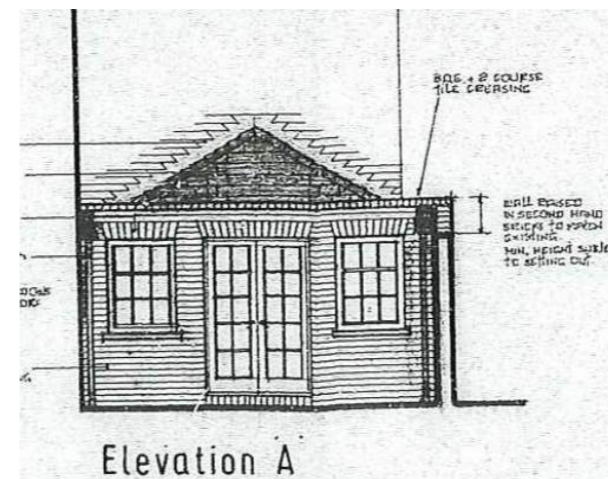
Proposed ground floor plan



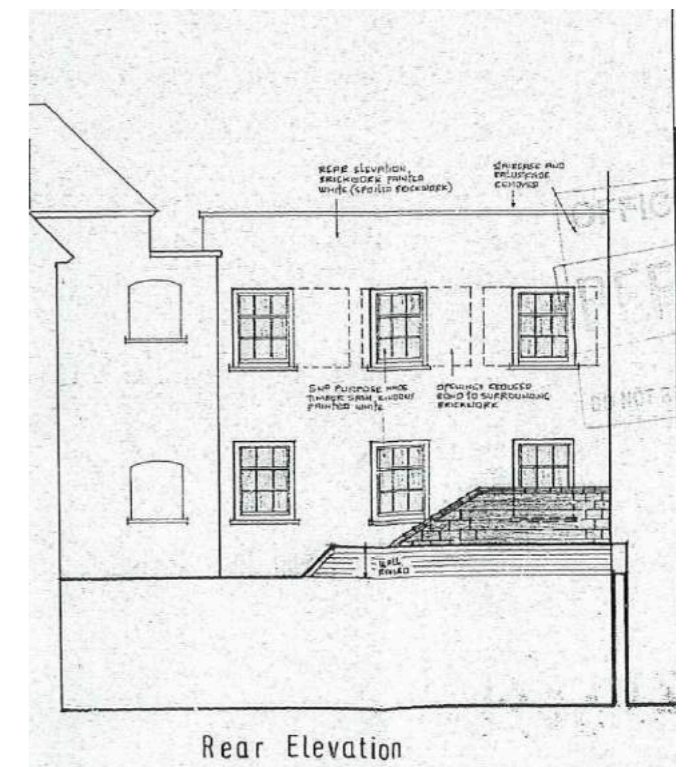
Proposed first floor plan



Existing rear elevation



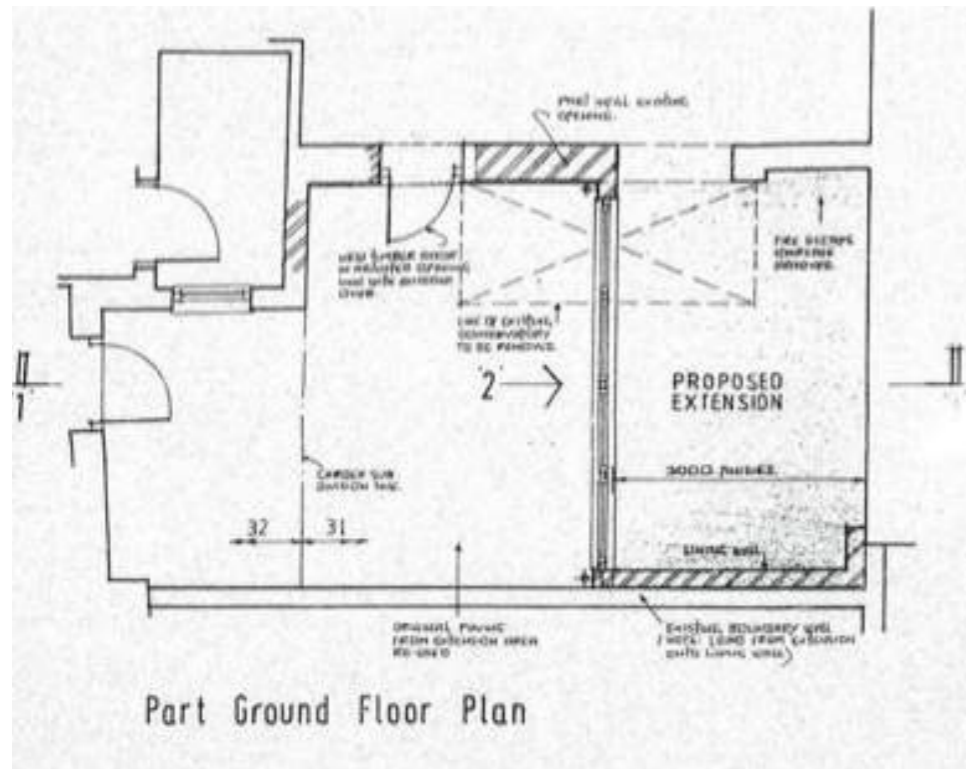
Part elevation of proposed rear extension



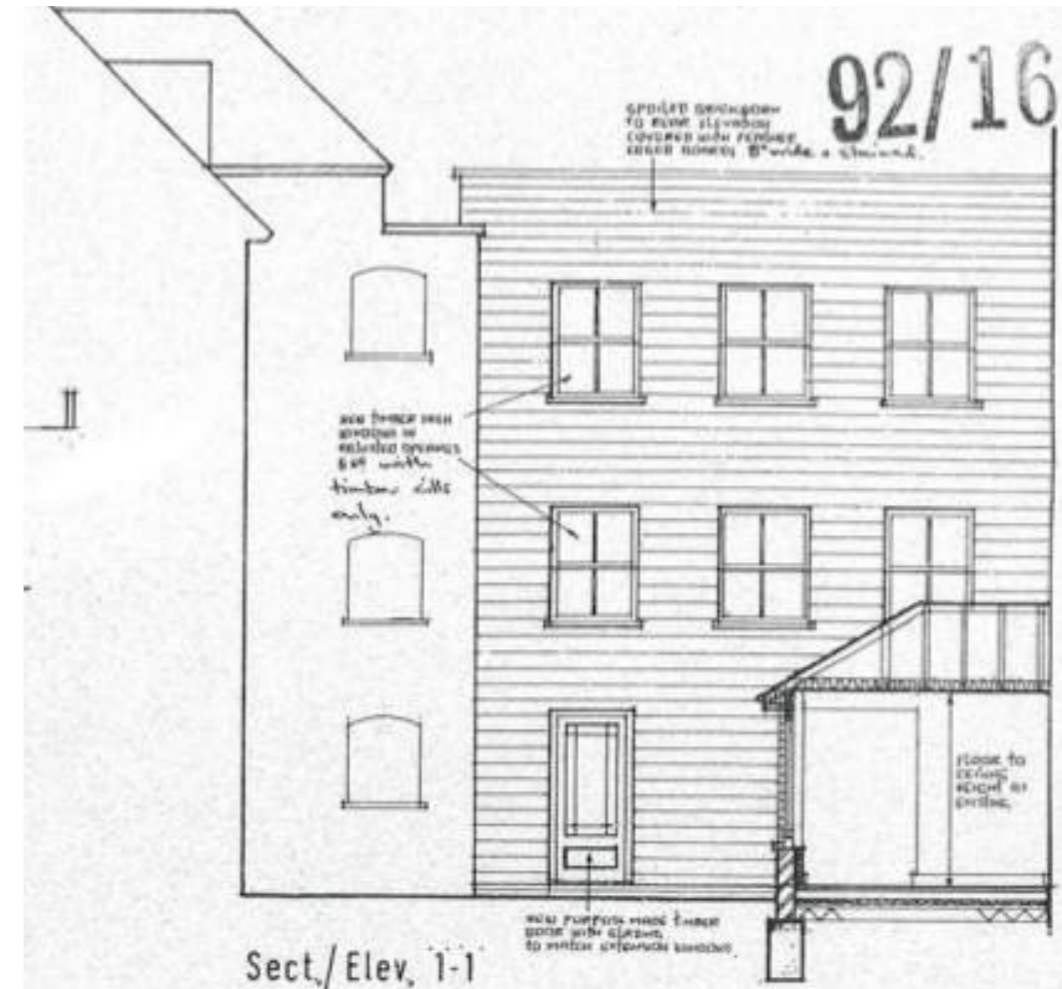
Proposed rear elevation.



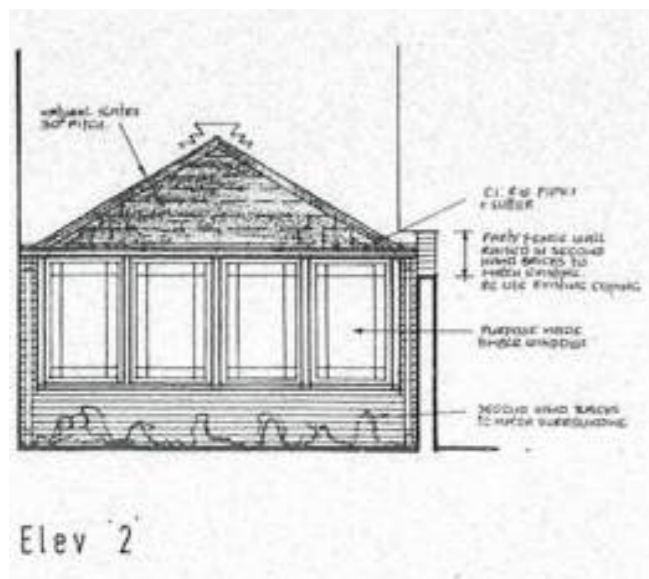
The following drawings are from the approved 1992 application 92/1623/FUL



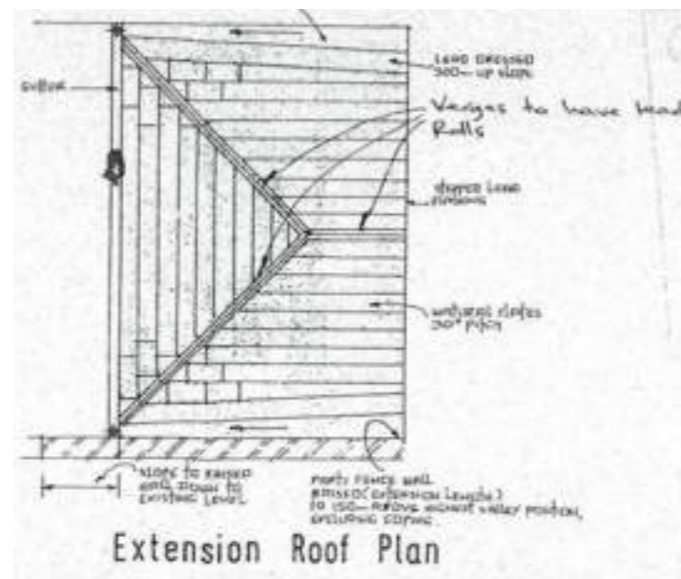
Proposed plan of rear extension



Proposed rear extension elevation.



Part elevation of proposed rear extension



Part plan of proposed roof to rear extension

These drawings show the 1992 planning application for the larger rear extension to replace the earlier 1960's conservatory. They show the associated changes, including the infilling of the existing opening where the conservatory was located, a new proposed door to the courtyard to align with the sash windows above and new timber cladding to hide the damaged brickwork and concrete blockwork infill sections.

As seen on the rear elevation drawing above, it was proposed that the new door would align with the sash windows on the floors above, however, it is evident that this door was not built in line with this drawing (see existing elevations on page 10), creating the argument for this opening to be moved to align with the windows as originally proposed.



Recent investigation works that took place in October 2023.

Please see a series of images illustrating the findings of recent investigation works that took place at the application site. A summary of our findings is listed below:

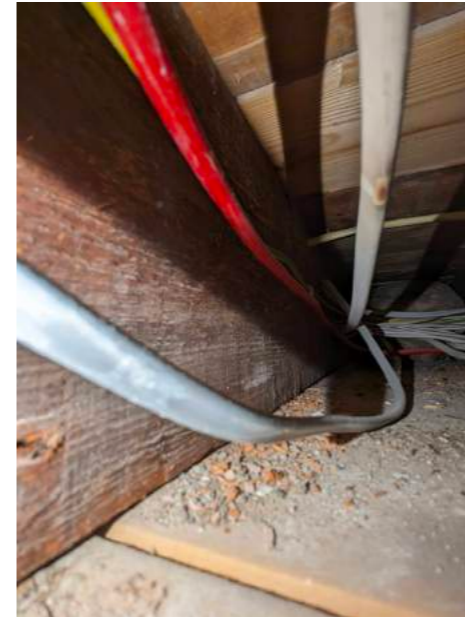
-The interior of the building appears to have been fully rebuilt in the 20th Century. Ground floor has concrete construction throughout. All upper floors have square edged timber joist construction, plasterboard ceilings and timber floorboards running whole length of the floors with no marks from previous partitions.

-All internal partitions are built from timber stud and modern plasterboard as there were no original partitions remaining post works approved by 92/1623/FUL in 1992. All interior mouldings and staircase are modern additions to the fabric of this building introduced when it was converted to an open-plan office.

-The rear elevation is clad in deteriorated timber boarding on battens that is covering a mix of historical brickwork and unsympathetic modern infills/ alterations to the masonry structure.

All inspected areas were reinstated to their original condition at the end of the investigations.

In summary, there is a lot of room for enhancement of this Grade 2 listed building.



First and second floor construction - views through light fitting apertures. Modern plasterboard attached to base of joists, overlaid with timber boards still light in colour on top of square edged joists



Flat Roof Construction - view through light fitting aperture. Square edged joists overlaid with timber boards.



Existing rear elevation - masonry behind cladding (ground and 1st floor)



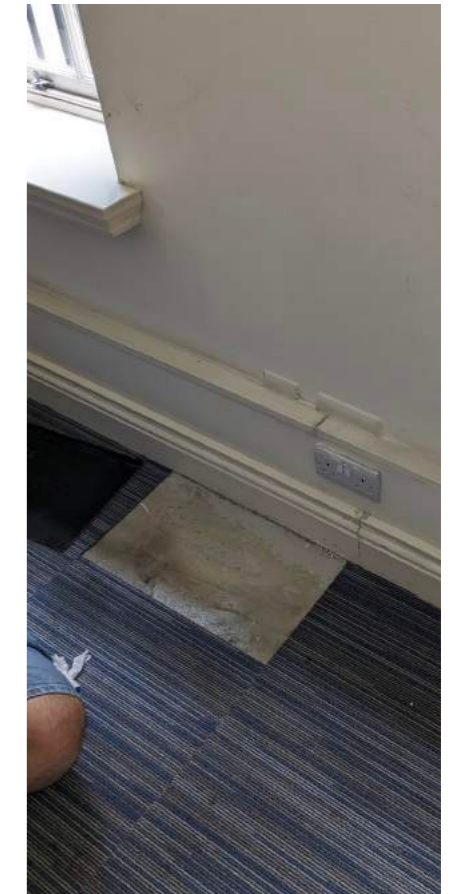
Existing rear elevation - masonry behind cladding (2nd floor)



All existing ceilings are lined with modern plasterboard



1st and 2nd floors are have 20C timber boards laid over the joists. There are no signs of previous partitions between windows



The whole of ground floor has modern concrete construction



## 06. Pre-Application Advice

As the property is a listed building, within a conservation area, we focused the pre application discussions around the possible effect the proposals could have on the historical significance of both the Listed Building and the Conservation Area. Therefore, Pre-application discussions were had with Sukhdeep Singh Jhooti who is the Planning Officer and Victoria Brocksopp who is the Senior Conservation Officer at LBRUT.

We have met with Victoria and Sukhdeep once onsite, exchanged a series of emails afterwards and presented them with a Public Benefit Statement prior to receiving formal Pre-application Feedback.

### Meeting with Sukhdeep Singh Jhooti and Victoria Brocksopp on the 17th July 2023

Meeting was held onsite where we toured the site and discussed the significance of the listed building, the rough proposals, and the change of use in-principle.

Heritage discussions with Victoria Brocksopp (VB):

-The building is Grade 2 listed and in a Conservation Area. In particular, it is part of a collection of Georgian properties that were built as residential dwellings surrounding Richmond Green. Prior to 1960 it was a residential dwelling.

-Following the site inspection in-person VB acknowledged that there is little of the historic fabric remaining internally within the building. It has suspended plasterboard ceilings throughout, modern layout, new stair and modern carpeted floors.

-In terms of the external elevations, VB advised that cleaning them up and removing clutter like CCTV cameras and other fittings, reinstating flush pointing on the brickwork to replace the weather struck pointing would be welcome from the heritage perspective.

-VB raised concerns about any new pipework as it should not be visible externally. When routed internally, joist cutting to allow service runs should be avoided. MJA to provide a method statement outlining general approach to pipework and other services. MJA to indicate service routes on plans to show where and how they would be routed internally.

-VB advised that typical internal elevations/sections of new fabric should be submitted to illustrate the works and how they interface with the existing fabric.

-Typical scribing, lighting, bathroom and window refurbishment details to be conditioned as part of the potential approval.

Planning discussions with Sukhdeep Singh Jhooti (SSJ)

SSJ raised the question of what are the public benefits of the change of use that outweigh any potential harm. The following were identified:

-Heritage benefits of reinstating the historic building into its original use.

-Reduction of parking stress to the surrounding area as a benefit to both local residents and the surrounding conservation area.

-Sustainability, from NPPF point of view, even small improvements i.e. solar panels on the flat roof would improve the environmental footprint (and in-turn reduce pollution) of the historical building. It was acknowledged that BREEAM Excellent rating is not feasible to achieve without damage to the listed building, but a reasonable exemption statement should be provided by an accredited assessor to justify that.

-Both bin and bicycle storage should be at the back of the house.

-1:20 section drawings should be provided to show doors at rear and window alterations.

-SSJ will check and advise if there is any residential CPZ parking allowance historically associated with the property and confirm whether removal of such parking permits would be a condition for approval.

-Construction management statement to be conditioned.

-Energy report and sustainable construction checklist (spreadsheet format) to be provided as part of the application. It will require a statement from a BREEAM assessor to justify why a historic building cannot meet certain sustainability criteria, and identify any improvements to be made in terms of sustainability.

### Email exchange one, sent post the first meeting 17-21 July 2023.

After the first meeting Ian Pedley from Michael Jones Architects emailed Sukhdeep Singh Jhooti(SSJ) and Victoria Brocksopp. We received a response from SSJ on the 21st July, both quoted below.

On 17th July Ian Pedley wrote:

*Dear Sukhdeep,*

*Good to meet you and Victoria this morning and thanks for your call just now. I thought a few notes on the precedent for change of use would be useful, for your chat with Nikki on Wednesday:*

*The building is Grade 2 listed and in a Conservation Area. In particular, it is part of a collection of Georgian properties that were built as residential dwellings surrounding Richmond Green.*

*Prior to 1960 it was a residential dwelling*

*In 1992 approval was obtained to change it to residential (not implemented) we have also provided evidence of local support for this, at the time.*

*The officers report of application 18/4268/FUL, which was for change of use of a similar building from a medical practice to residential, states 'This is a Grade 2 listed building of which the original use was a dwelling house.... and as set out in paragraph 4.3.9 there is support for using the buildings for their original purpose. This is therefore a benefit of the principle of the change of use which could be considered to outweigh the requirements for marketing under LP 28.C.3' Please note this was refused due to no agreement on affordable housing contributions, the principle was supported'.*

*Please also note 4.3.10 of the LP.*

*The officers report of application 13/4340/FUL, which was for change of use of a similar building from a office / storage to residential, states 'Paragraph 5.3.10 to this policy (DM EM2) states that there may be some instances where other appropriate evidence relating to a particular employment premises will be considered by the council (instead of marketing evidence). These could include listed buildings where the original use was residential. In this particular instance the listed building would have originally been a single residence. Although some inappropriate alterations have taken place, including the loss of a ground floor window, changes to some rear windows and internal floor level changes, loss of fireplaces, doors and mouldings, a number of historic features survive. The Council's Conservation Officer supports the proposed change of use as it would return the building to its original use, and unlock significant investment for its restoration and reinstatement of important features such as the ground floor sash window .... and front railings. This in turn would have a positive impact on the significance of this heritage asset and result in an enhancement of the character and appearance of the Richmond Green Conservation Area, of which the building forms a prominent feature. The above considerations would lend significant weight to a departure from the normal policy provision or requiring the retention of employment floorspace. In circumstances where it is determined that the loss of employment floorspace is acceptable, Policy DM EM2 requires the affordable housing provision to be maximised. Therefore, in this particular instance it is considered that the reinstatement of the listed building to a single dwelling house,*



with associated internal and external improvements would outweigh the loss of 220 sq.m BI(a) employment floorspace providing an acceptable affordable housing contribution if provided in line with Policies CPI5, DM HO6 and the SPD

The applicants site presents identical issues and rational. It is also tested against the adopted LP and even the 2014 approval works with current policy. There are other precedents we can forward if useful.

The benefits are both the reinstatement of the listed building to a single dwelling house, with associated internal and external improvements which include reinstatement of a front gate, removal of modern fixtures on the front elevation, restoration of the compartmentalised floor plan where possible, reduction in recessed downlights and reinstatement of lighting in keeping with the building, removal of suspended ceilings where possible and the exposure of original lath and plaster ceilings if evident. We will also make improvements to the energy efficiency through the introduction of an air source heat pump and solar panels, reductions in parking stress via reduction or loss of permits and contributions to CIL and affordable housing. None of these benefits are possible under the existing use.

<...>

In response to this message, Sukhdeep Jhooti replied on the 21st July:

<...>

We have a 2021 employment study which does strengthen case for retention

Nicki has confirmed that as with any app, a departure to policy may be justified by other material considerations if strong enough in weight to do so. The agent would have to make a case that there are very significant and demonstrable benefits for the LB.

We'd need to be advised by UD on the package of measures you are proposing, their acceptability and weight to be given to them in justifying a departure from policy.

Any examples from 2013 don't carry weight given LP was 2018, loss of offices from prior approvals etc.

The 2018 case I have looked at and there is very detailed and specific information in the officer report as to why the medical centre was ok in being lost. This happens a lot with DR surgeries in houses which have to be lost as surgeries merge with other surgeries due to the way the integrated care boards/CCG's plan for primary healthcare.

The loss of the office without really strong heritage benefits will be tricky for us to support or without marketing.

<...>

#### **Email exchange Two 26-27th July 2023.**

Following the initial discussion, strengthened arguments and conclusions were presented by Ian Pedley from Michael Jones Architects where we established that change of use is a benefit in principle as we are returning a listed building back to its original use. In addition, it was established that strong heritage benefits outweigh the requirement for the sequential marketing approach to justify change of use.

On 26th July Ian Pedley wrote:

Thanks for this Sukhdeep, and good to hear that Nikki agrees that strong heritage benefits can outweigh the need for marketing. I assume you both therefore agree with the planning officer in the 2018 application who notes (as a standalone point) "This is a Grade 2 listed building of which the original use was a dwelling house.... and as set out in paragraph 4.3.9 there is support for using the buildings for their original purpose. This is therefore a benefit of the principle of the change of use which could be considered to outweigh the requirements for marketing under LP 28.C.3'

Noting that we need really strong heritage benefits, Victoria please can you advise on the weight of the current schedule of

works and action to revert the house back to its original use so we can understand if that is sufficient? The paragraph and quote from the planning officer above would suggest it does?

<...>

In response to this message, Sukhdeep Jhooti replied on the 27th July:

You do need to provide benefits that can only occur with this change of use. With that 2018 case they also had evidence from the NHS that the medical centre was no longer needed. In this case we will only know that through marketing but we have a 2021 employment land study which says we are in short supply of offices and the demand for such use is projected to grow.

#### **Email exchange Three, informal Pre-application Feedback 2nd August 2023.**

In the informal pre-application feedback alongside general comments it was established that proposed layout is not period appropriate and that further heritage benefits are required.

On 2nd August Sukhdeep Jhooti wrote:

Heritage Comments are as follows:

31 The Green is a Grade II listed building, located within the Richmond Green Conservation Area (CA3) towards the southernmost corner of the green.

The property was originally residential in use up until c.1960, but was then converted to office use. At some point prior to 1960, no. 31 and no. 32 were joined and served as one building, with internal alterations that included the removal of the original staircase for no. 31. A planning application in 1992 (92/1623/FUL) indicates that permission was granted for this party wall to be re-instated and both buildings to serve independently, with a new staircase introduced for no.31 in what is likely to be a non-original location. Since 1992, no. 31 has continued to serve a commercial use, with a private bank occupying the premises since 2014.

The property comprises a late eighteenth century townhouse in brick, presenting a three storey principal elevation of four bays to the street. The entrance is off centre to the right. Windows are square headed, with flush framed surrounds and glazing bars in a 6-over-6 arrangement. The roof is concealed behind a parapet but is understood to be flat roofed, indicating previous alterations at that level.

The front elevation is relatively unaltered, aside from lighting and signage associated with the current office use. There have been alterations to the rear elevation, with full height timber cladding concealing the original brickwork and a large rear extension, built in 1992 which replaced an earlier conservatory dating from 1972.

The linking with no.32 and change of use during the twentieth century would appear to have had a considerable impact on the interior of the property at no.31. It retains little of its original residential plan form, now with open plan offices, modern partitions creating storage rooms/WC facilities and an altered staircase location. At ground floor there is modern arrangement to the entrance lobby partitions. There are suspended ceilings with modern plaster to the walls and modern cornicing/skirting.

The property fronts onto Richmond Green and is an important contributor to the conservation area's character and appearance via its historic character and its largely unchanged principal elevation, forming part of a collection of listed buildings which line the Green and provide a highly characterful backdrop to the green space.

Pre-app proposals

The pre-app proposals comprise a change of use from office space into a single family dwelling house consisting of minor modifications and restoration works to the listed building.



## Change of Use

The change of use of the property to residential use would involve the return of the building to its original use, however the office use is protected under local policy and therefore the change of use would need to be justified robustly as part of a planning application. There are no objections from a purely heritage perspective if the works associated with the conversion do not cause unnecessary harm to the listed building. However, in order to overcome the lack of accordance with local policy in terms of the change of use, it would need to be demonstrated that the conversion to residential results in the optimum viable use for the building and results in less intervention than the present office use, thus leading to a benefit in heritage terms. It would also need to be demonstrated what works could be achieved from the conversion that could not be achieved from the retention of the current use.

The current package of heritage benefits presented by the applicant is not considered to be sufficiently robust.

The return of the residential use would in itself bring minimal benefits given that the original floor plan has been lost (the earliest plans presented in the pre-app pack date from when the building was already altered and linked to no.32 in the 1990s). The applicant has advised that despite archive research, no evidence has been found of the historic floor plan to allow for its restoration, so it does not appear at this stage that a case could be made that the new use would better reveal the significance of the property and its history.

There are minor benefits derived from improvements to the front elevation (removal of burglar alarm, CCTV etc) and restoration of a lost gate. There is also minor benefit to be gained from repairs and decluttering of the rear elevation, as well as works to reinstate a window previously converted to an entrance, relocating it to match the line of the windows above (as should have been implemented as part of the 1990s works).

Internally the proposals would retain the modern ceilings, cornices/dados/skirting and plastering, so a case cannot currently be made that historic features of the building would be revealed/restored to reverse some of the harmful twentieth century alterations as a heritage benefit. However, even if this were not the case it would still be difficult to demonstrate robustly that restoration works would rely solely on there being a residential use to the building and could not be undertaken as part of the current use.

The applicant may wish to consider whether there are any further archive research options to clarify the historic plan, to inform proposals relating to subdivision and to create a more historically accurate proposed layout. They may also wish to consider whether there are opportunities to better reveal historic architectural features currently concealed by the modern suspended ceiling. This could form a potential enhancement to the listed building that could be counted in the planning balance in relation to the principle of the change of use. However, we would emphasise that a robust case would be required to overcome the local policy requirement, well beyond those heritage benefits already offered.

### Detailed comments on the pre-application proposals

#### Demolition works:

- o Curved wall of kitchenette
- o Entrance lobby reconfiguration
- o Masonry beneath the courtyard window in the modern rear extension

The curved wall of the kitchenette at ground floor and the partitions to the entrance lobby are modern insertions and their removal would cause no harm to the special interest of the building. The extension to the rear is modern in date and alterations to convert the windows fronting onto the courtyard into a sliding/folding door would not involve the loss of any historic fabric. The demolition works are all acceptable in principle, subject to the making good of fabric to match the existing.

#### New works

##### Ground floor

Works to reconfigure the entrance lobby in a different position, with glazed partitions, would not reflect a typical hall for a property of this period, but would cause no additional harm compared with the current arrangement.

Other works relate to refurbishment of the existing WC/replacement of sanitaryware, which would not impact on historic fabric. A new kitchen would be introduced in the location of the existing kitchenette, taking advantage of existing pipework and service runs, which seems a sensible approach.

It is noted in the D&A that an existing boiler flue is to be removed and relocated, without any further information about the new location or reference to it in the schedule of works. Further details would be needed on this point about the relocated boiler/flue as part of any application.

The existing flooring is to be lifted in the course of works. Timber floorboards would be numbered, carefully lifted and protected during the works and restored in the original locations. This is acceptable in principle but would require a method statement, clarifying any fixings and storage during the works.

The rear extension is modern and works in this location would not impact upon historic fabric.

##### First floor

At first floor a new plan form would be introduced to create two bedrooms with en suite bathrooms, including reconfiguration of the existing WC to create one of the en suites. Again, this layout would lack historic authenticity with respect to the individual property's former layout, or reflect typical layouts for properties of the period.

##### Second floor

At second floor modern partitions for storage/server rooms (introduced under 12/2917/LBC) would be removed and the plan reconfigured to create a bedroom with en suite. The ensuite would be created with glazed sliding doors, to allow for appreciation of the wider space across the floorplan.

##### General

Existing cornices, dados and skirtings would be retained and replicated as part of the new works, but these are modern insertions and do not contribute to the special interest of the property.

No plans have been submitted showing service runs but discussion on site indicated that pipework for new ensuite would be carried down within modern wall cavities, rather than cutting across floors. Further information should be provided as part of an application to demonstrate no harm to historic fabric.

New electrical wiring for wall lights would be chased into the modern plaster and made good to match existing.

It was agreed acceptable that as part of an application joinery drawings could be submitted to demonstrate the general approach.

Further clarification is sought with respect to the ground floor side elevation of the living room, which appears to show some boxing in/feature across the wall not shown on the existing drawing.

The schedule of works includes reference to window restoration, further details would be needed as part of an application to clarify these works.

Any bin or bike stores would have to be located to the rear of the property.

##### Summary

In broad terms the proposals would not impact upon historic fabric, owing to the degree of internal alterations that have already taken place at the property. However, the proposed floorplan would be atypical of the period and the proposals would



largely maintain its current character as a bank, by retaining and restoring the current décor of modern plaster/decorative details. As such, aside from some minor beneficial works, the proposals offer only a low level of heritage benefits to be considered in the planning balance with respect to the proposed change of use back to residential.

**Email exchange Four, 8th September 2023.**

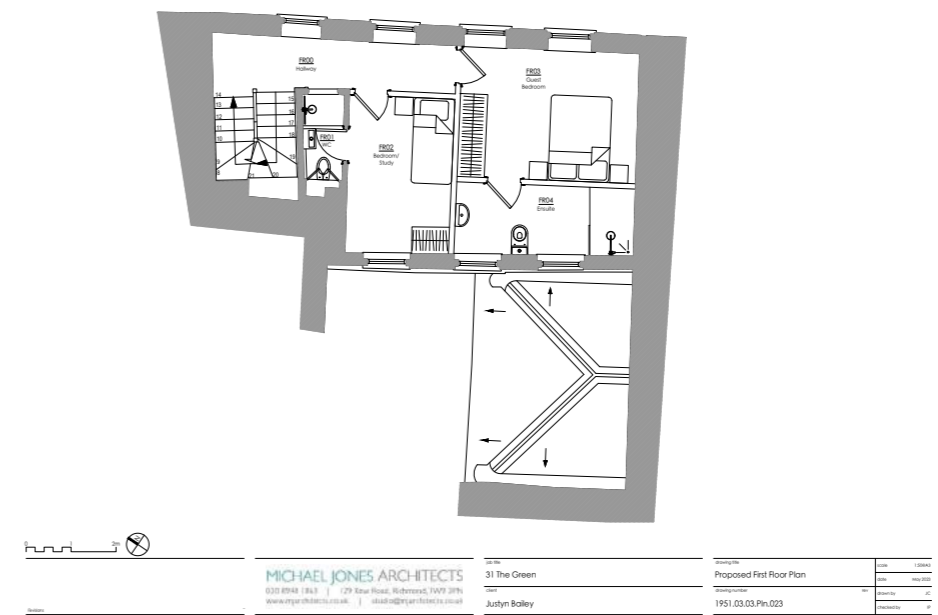
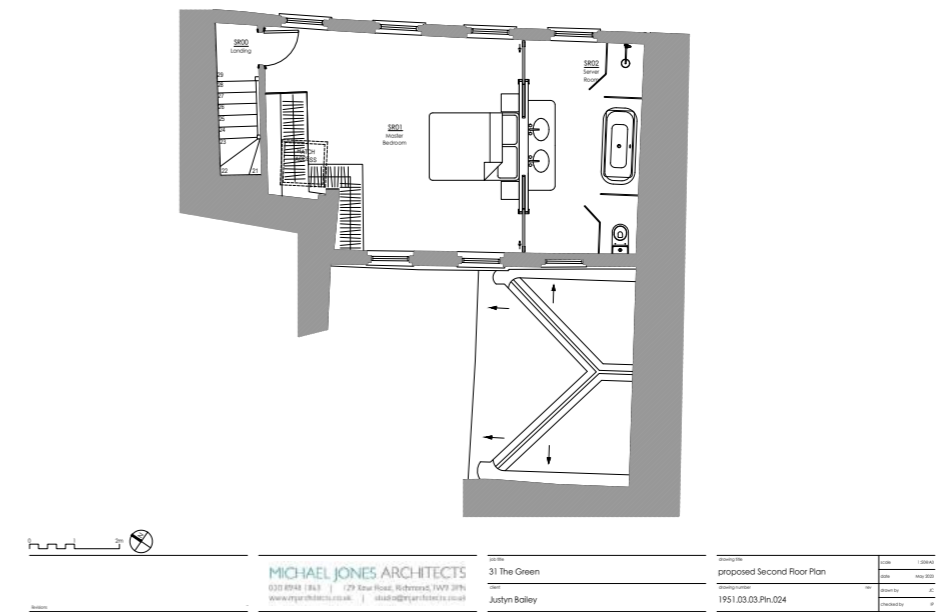
Following the informal pre-application feedback, we received further feedback from the conservation officer quoted below, and advised that reinstatement of the period-appropriate layout would contribute to the weight of the heritage benefits.

On 8th September Victoria Brocksopp wrote:

*My sincere apologies for the delayed response after being on leave. By way of an update, I have made enquiries as to any other possible sources with respect to the interior plan of the property but as yet my understanding is that all the information we have access to is already publicly accessible in the local archives (which I think I am right in thinking you have already exhausted).*

*I have taken senior advice on your other query and whilst the reinstatement of a period-appropriate plan and details would indeed offer some enhancements and add character to the building, the weight we could give to them as heritage benefits would unfortunately be limited if they are only generalised interpretations.*

<...>



Initial proposed plans submitted with the pre-application



**Email exchange Five, 18th-28th September 2023.**

To further improve our proposal, we provided revised floor plans and a Public Benefit Statement to the Planning and conservation officers. Once this was reviewed, we heard from the conservation officer acknowledging the increase in the heritage benefits offered.

On 18th September Ian Pedley wrote:

*In light of your comments, about providing really strong heritage benefits, we have undertaken further research and are happy to confirm we have found further evidence on the buildings' original plan form and the earlier rear elevation meaning we now have some really strong heritage benefits proposed for high level review.*

*Please see the attached letter outlining these along with other public benefits that come together to result in really strong public benefits.*

*Please can you review and advise on if this, with the right supporting evidence and detail in an application, is in principle able to achieve what is needed to outweigh departure from policy regarding loss of office space.*

*I would note that it includes much more significant work to restore the rear elevation, restoring fireplaces, reinstating partitions in original locations, a plan form reflecting historical norms of its period, reduction of on street parking (reduction of parking stress) and substantial ecological and environmental benefits, all not possible or enforceable under its existing use.*

On 18th September Victoria Brocksopp wrote:

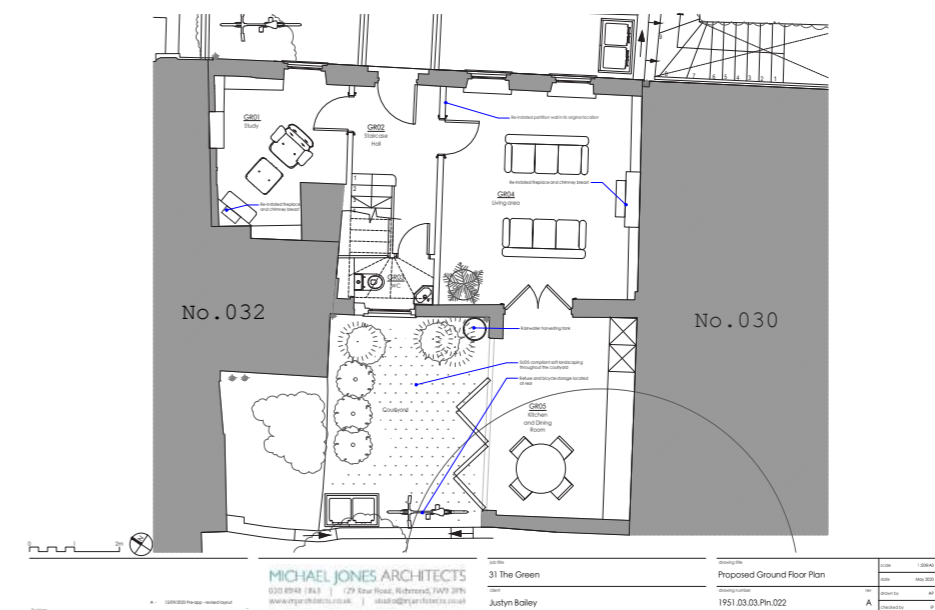
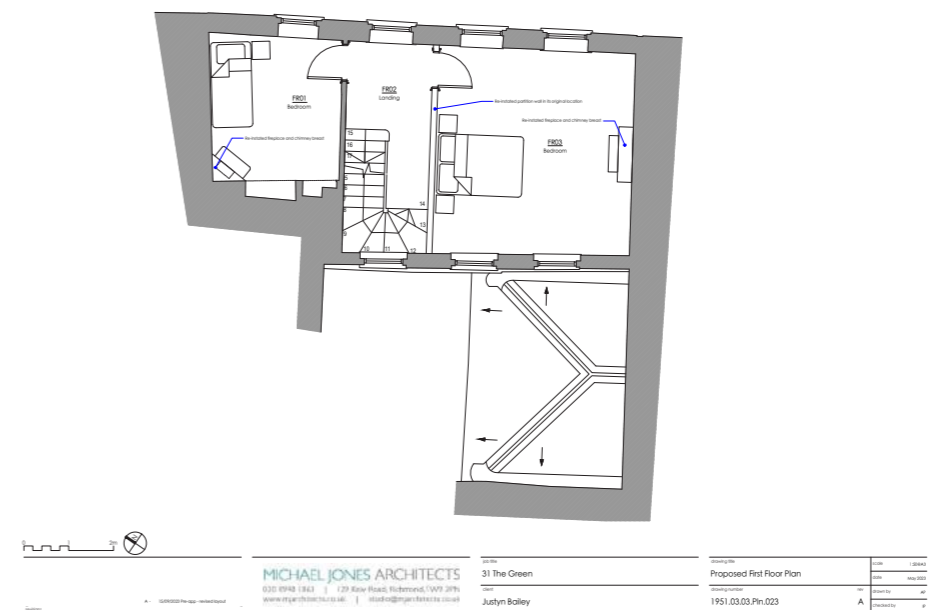
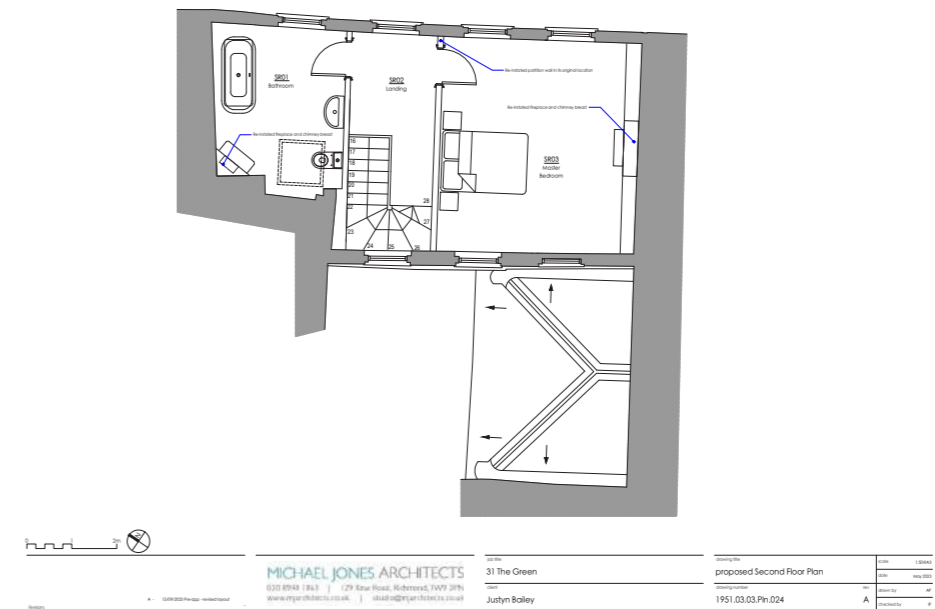
*Many thanks for your email, that is interesting that you have been able to source some internal plans to demonstrate the earlier plan form. I will go through this in detail and speak with Sukhdeep as to how this affects the weight of heritage benefits in the wider planning balance and be in touch.*

On 21st September Victoria Brocksopp wrote:

*Having reviewed your revised proposals in more detail we can acknowledge there are increased heritage benefits compared with the previous proposals, relating to the historically informed floor plan. I cannot speak for the weight that those heritage benefits will be given in the wider scheme of things, but just to confirm I will provide updated comments to Sukhdeep so that they can be suitably weighed in the planning balance.*

On 28th September Sukhdeep Jhoti wrote:

*Nicki has said it is not an impossible argument regarding heritage benefits but we need Victoria's updated comments. I have asked her to provide me with those.*



Revised layouts submitted alongside the Public Benefit Statement post informal pre-app feedback



## Formal Pre Application Feedback, 16th October 2023.

Formal Pre-application feedback supports the change of use in principle:

*With regards to the acceptability of residential development in this locale, it is noted that Policy H2 of the London Plan 2021 states that Boroughs should pro-actively support new homes on small sites [below 0.25 hectares]. The Council has been given a target to deliver 2,340 homes on small sites up until 2028/29. Paragraph 4.2.4 of this policy notes that incremental intensification of existing residential area within PTALs 3-6 or within 800m distance of a station or town centre boundary is expected to play an important role contributing towards the housing targets for small sites. Conversion of non-residential buildings is one way of achieving this. The site is within a Main Centre Boundary, it is within PTAL 6a and is 800m distance of the nearest station. In the Regulation 19 Local Plan the site and surrounds are designated as areas for incremental intensification. It is recognised that listed buildings are best used for their original purpose. As such, subject to addressing the loss of employment policies, a residential use would be acceptable in this locality subject to comply with other policy requirements.*

Formal Pre Application feedback was issued via email, the conclusions are as follows:

*There is an in-principle objection to the loss of the office. The scheme does not provide a marketing exercise as required by Policy LP 41 of the Local Plan 2018 to demonstrate that the office use is no longer needed and that the site cannot be developed for other commercial or social and community uses. Whilst the case for heritage benefits is appreciated and would be afforded weight in the assessment, this would not outweigh the loss of office in the complete absence of any supporting evidence to justify that loss.*

In an email accompanying the formal pre-application feedback also dated 16th October Sukhdeep Jhoti wrote:

*Nicki and I have agreed we need a mixture of heritage benefits as well as some marketing/justification for the loss of the existing office. To rely just on heritage benefits would be a departure from policy the local plan and that is a huge ask.*

*Knowing the following would help:*

*The position of the current tenants and whether they have found a new office*

*Current leasing arrangements*

*State of current office, how much in financial terms is needed to bring it up to scratch*

*Are there more modern offices within let's say 1/4 mile radius of site*

*Someone like Michael Rodgers or any other marketing agent could produce a report to justify the loss. You even do six months marketing at least alongside the above. Marketing it for office and any other class E use.*

*To rely just on heritage benefits will be a difficult pill to swallow as would be departure from the local plan and policy [LP41] but a mixture of heritage benefits as well as justification for the loss of the office would mean we can make a case on how it will be good for heritage, good for housing supply. demonstrating how there is no demand for this office/does not serve any purpose/not viable to bring up to scratch would help.*

## Our response to Formal Pre Application Feedback

In summary, it was confirmed that the council in-principle support reinstating historical buildings to their original purpose/use. The pre application feedback shows that our proposal will gain approval if certain criteria listed below are satisfied.

Although it may go against the local policy about the loss of office space. During the discussions with the LBRUT planning and conservation team it was established that the planning balance will be reached and exceeded in terms of benefits once the applicants present substantial heritage and planning benefits to outweigh this departure from local policy.

We have prepared a response to the LP 41 policy - the clients commissioned an independent marketing report accompanying this application. The marketing report clearly shows that study data pre-dating coronavirus pandemic on which the LBRUT policy relies is outdated. The demand for office space has decreased and there is a significant amount of vacant modern office space in the immediate vicinity of the application site.

We have found additional heritage benefits, namely:

- Sensitive reinstatement of the rear elevation designed in a way it could be reversed without damage to listed fabric if required. No historic masonry that may be present onsite would be affected.

- Reinstatement of the period appropriate floor plans.

- Reinstatement of the stairs and period appropriate hierarchy between the existing floors of the building.

- Complete replacement of harmful modern plasterboards with breathable lath and plaster throughout the building.

It was established that heritage benefits alone are not enough, hence we are presenting a series of additional public benefits outlined below and further elaborated in the statements by HCUK. Local Plan 9.5.6 states that reversions of houses converted into flats back into a single family dwelling house may be considered acceptable if the property was originally a single family dwelling house and it can be demonstrated the loss of units will be outweighed by environmental, street scene, transport or parking benefits which could not be easily achieved without the reversion. Evidence of tangible benefits is required from an applicant to justify an exception on this basis. This can include assessments of sustainability or the poor standards of existing units.

Stronger justification for an exception needs to be made where there is a greater loss of existing units. We do not have greater loss of units as it is a conversion of a single unit back into original use as a single family dwelling. Therefore, we are of strong opinion that the justification set out in this application is more than sufficient for the local authority to support our application.



## 07. Design proposal

### 07.1. Introduction

There are some key features to consider when designing the proposal:

- Firstly, to revert the use back to original - a single family residential dwelling.
- Tidy up the front elevation.
- During reinstatement of original use, restore the former layout, staircase typology and compartmentalisation of spaces. More importantly reinstate period-appropriate hierarchy between the floors reflected in internal detailing (lath and plaster to replace modern plasterboard throughout, stair design and typology, skirtings, dado rails, cornices, panelled doors).
- Re-face the rear elevation by replacing the modern timber boarding with a reclaimed London stock brick finish. Brick slip finish, bonding, pointing and window headers to match rear elevation of no32 The Green.
- Create a better connection to the rear courtyard through minor alterations to the existing openings and window treatment.

### 07.2. External works

#### Front Elevation

Architecturally, the front elevation to 31 The Green will remain largely unchanged. The only changes being the removal of general clutter. Including: the brass *Handelsbanken* plaque, lights, burglar alarm, CCTV camera and advertisement stickers in the windows. As well as this, the gate that matches the existing iron railing will be installed. Reinstating the gate will re-establish a historic detail that can be seen on the painting by Frederick Viner (page 4).

#### Rear 1990's extension

The existing modern windows to the rear 1990's extension are to be replaced with a new timber framed glass door, within the existing structural opening with a lowered cill. Only modern masonry would be affected.

#### Rear Window & Facade treatment

The existing modern kitchen door, that was built as part of the works during the 1992 rear extension is to be replaced with a sash window that matches those on the upper floors, front and rear elevation. As highlighted (page 8), it was originally as part of the works in 1992, that this door should align with the upper floor sash windows, but was never constructed in this way. The proposed window will align with those on the upper floor; by adjusting the existing structural opening to suit. By doing so, it adds regularity and alignment to the elevation and make the window look more in-keeping with the existing treatment of the facade.

It is also intended that there will be a number of repair works to the rear elevation. The damaged timber cladding will also be removed and this facade will be clad with reclaimed brick slip to match our neighbour. The loose cabling, draping from the roof will also be tidied and repaired where necessary. Additionally, the alarm and lighting fixtures, along with the outside tape and boiler flue either side of the door will be removed.



Existing photograph of the front elevation (1)



Existing photograph of the front elevation (2)



Existing Photograph of the rear extension (1)



Existing photograph of the rear extension (2)



Existing door to be replaced with glazing



Damaged timber cladding to be removed

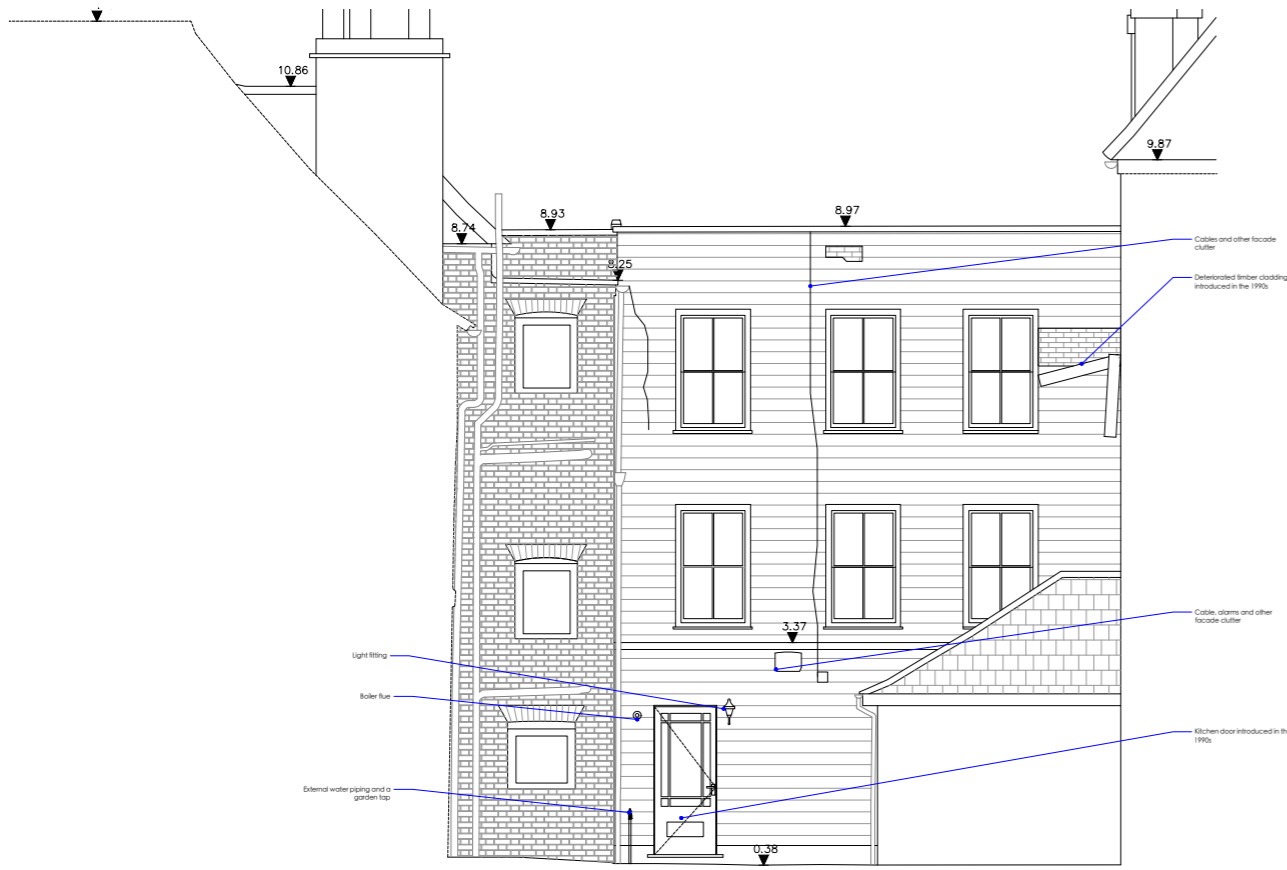




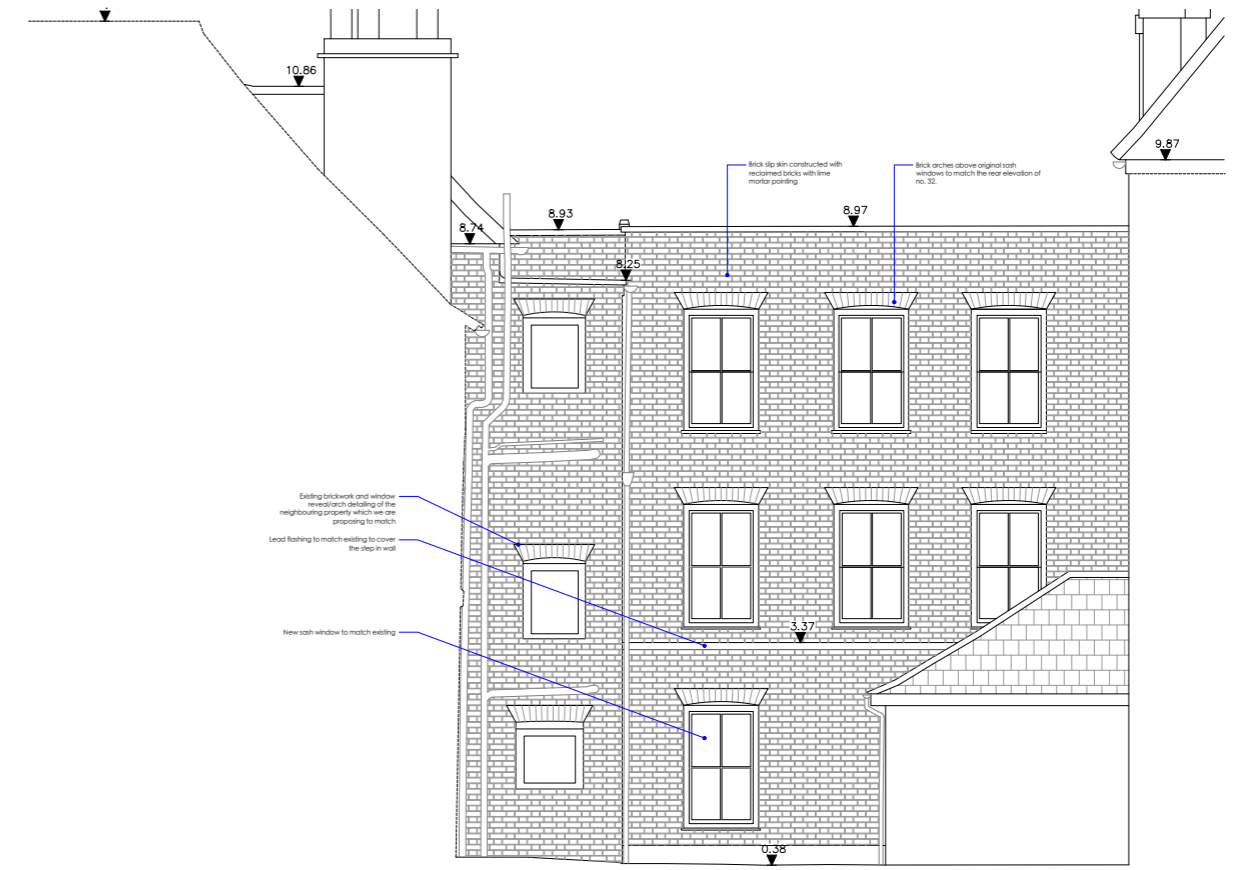
Existing Front elevation



Proposed front elevation



Existing rear elevation



Proposed rear elevation



### 07.3. Internal Work

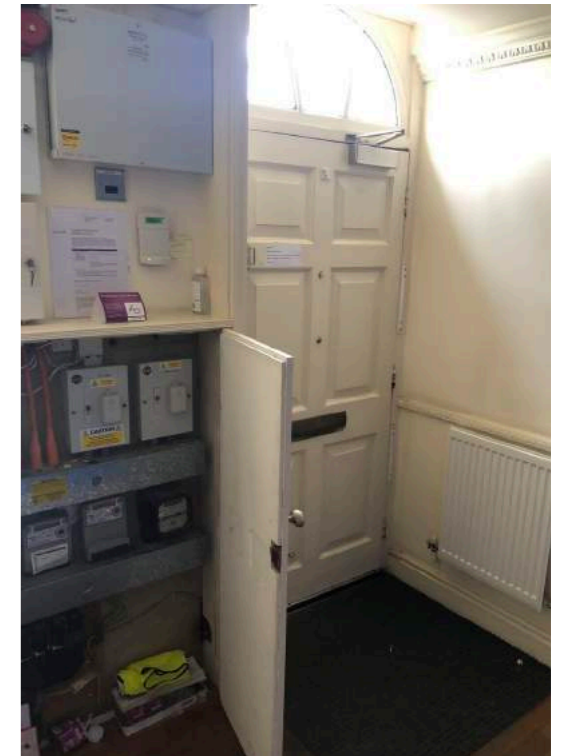
#### Ground Floor

Modern partitions are to be removed and the buildings original layout is to be restored. This includes removing the partitions forming the office and service spaces. All were a later addition as part of the work in 1992 and is not part of the existing historic fabric. This would have no negative impact on the heritage significance of the building.

Additionally the modern low level curved wall as well as all associated joinery that forms the kitchenette are to be removed. All modern plasterboard is to be removed and replaced with lath and plaster and period appropriate cornicing, dado and skirting. Boiler and associated flues, pipework and trunking to be removed. Also, the new window replacing the existing door to the courtyard will enclose the living area.

As mentioned on the previous page. The existing glazing to the rear extension, which currently houses a meeting room, is to be replaced with sliding doors within the same structural opening. The existing ground floor WC is to be removed.

The bank has extensive IT, electrical and security alarm services installed in the entrance call. Such are not required for a residential dwelling. IT cabinets and service clutter to be removed and replaced by internet connection and distribution board located beneath the proposed stairs. Lastly, the existing modern staircase is also to be removed and a new period appropriate stairwell of timber construction is to be built in the centre of the floor plan in order to further restore the building's original layout.



Existing IT cabinet



Existing entrance foyer



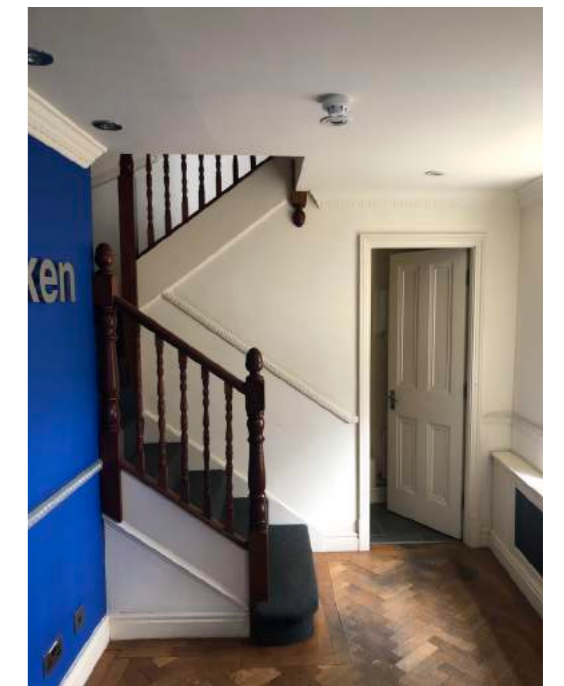
Existing kitchenette to be removed



Existing meeting room space

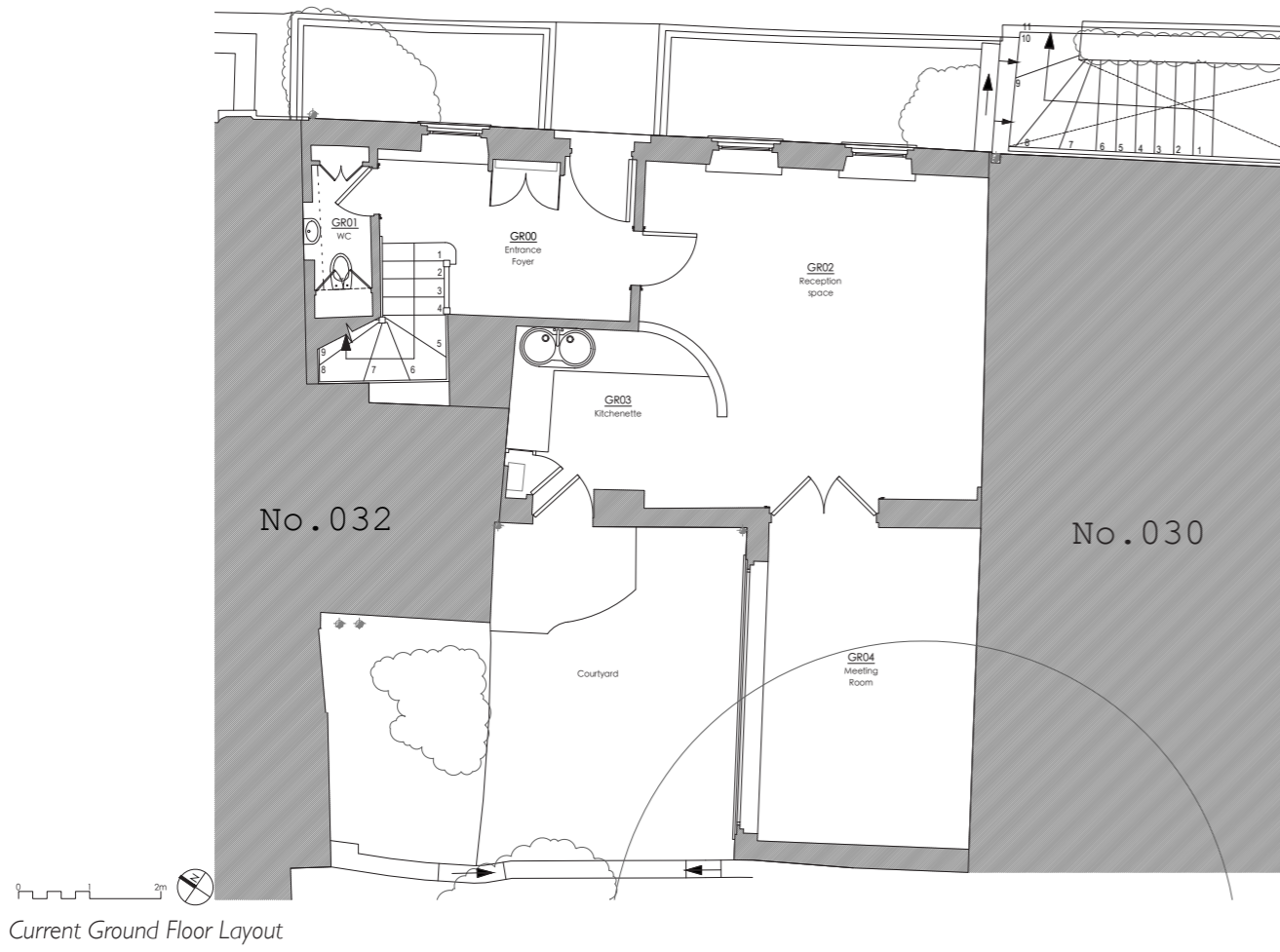


Existing ground floor WC

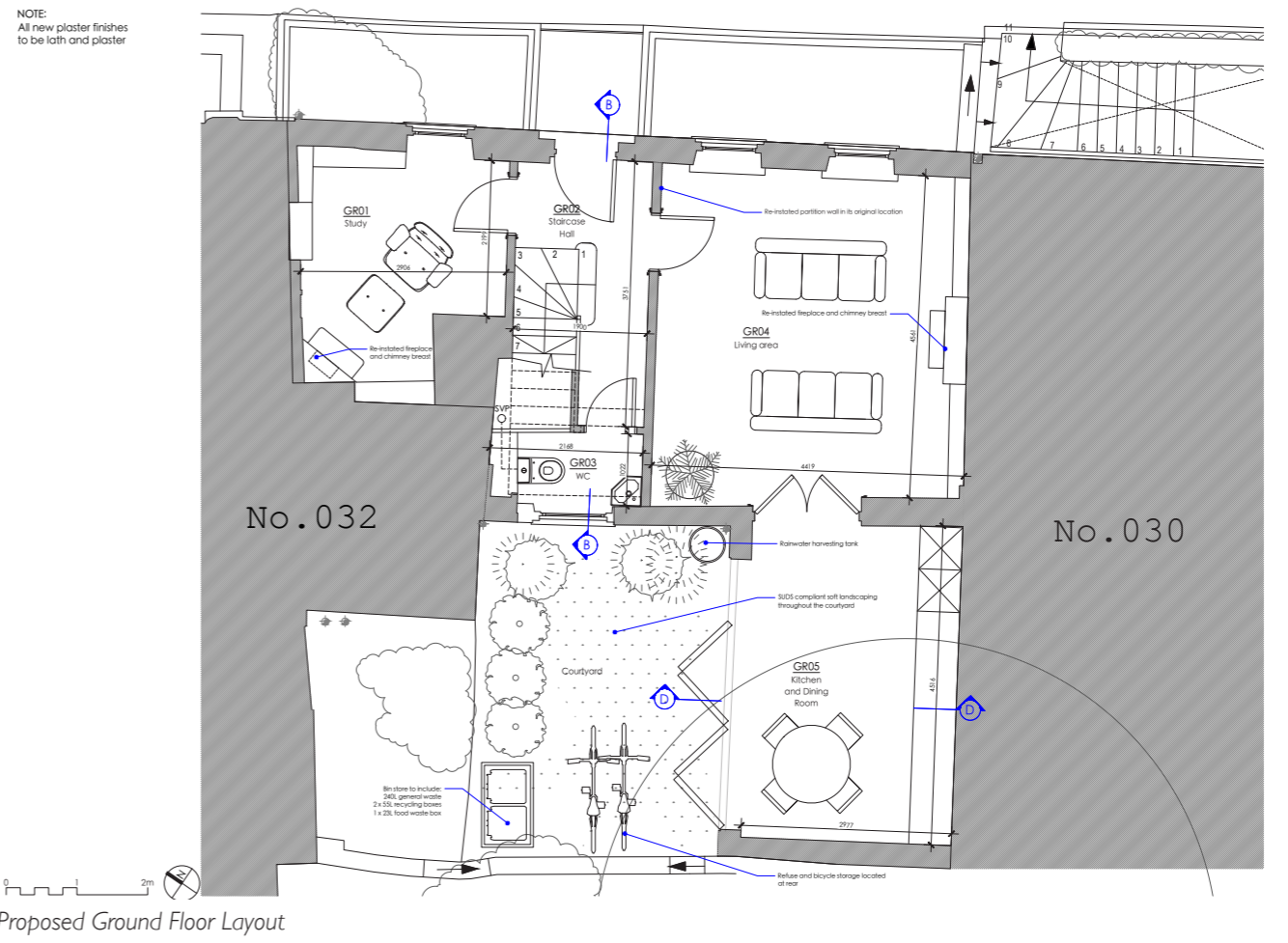


Existing ground floor staircase





Current Ground Floor Layout



Proposed Ground Floor Layout



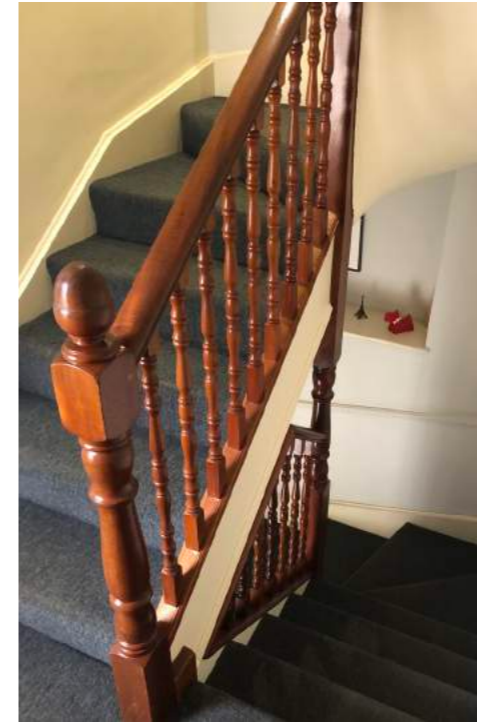
## First Floor

The proposal to the first floor looks to fragment the existing floor plan to restore a more compartmentalised plan, restoring the plan form back to that of a dwelling; while restoring the historic fabric.

The existing modern partition and door to the office space are to be removed and new partitions are proposed to create 2 new bedroom spaces on either side of the reinstated central stair. Resultantly, the entrance landing deepens, to allow access to both new bedrooms. All plasterboard and skirtings, architraves and cornicing are to be replaced with lath and plaster and period-appropriate mouldings. The existing modern WC and stair will be removed.

The existing staircase will be replaced by a period-appropriate timber stair located centrally within the building. Existing C20 joists and floorboards will be re-used to infill the former staircase position.

The proposed works on this floor does not have any impact on the external fabric of the building. Historic fabric is believed to only be within the front and rear walls of the building. The existing fabric of the building will be restored during the work on this floor.



Existing stair at first floor level to be removed



Existing WC at first floor level to be removed



Existing first floor hall way and existing WC entrance (door to RHS)



Existing first floor office space (facing The Green)

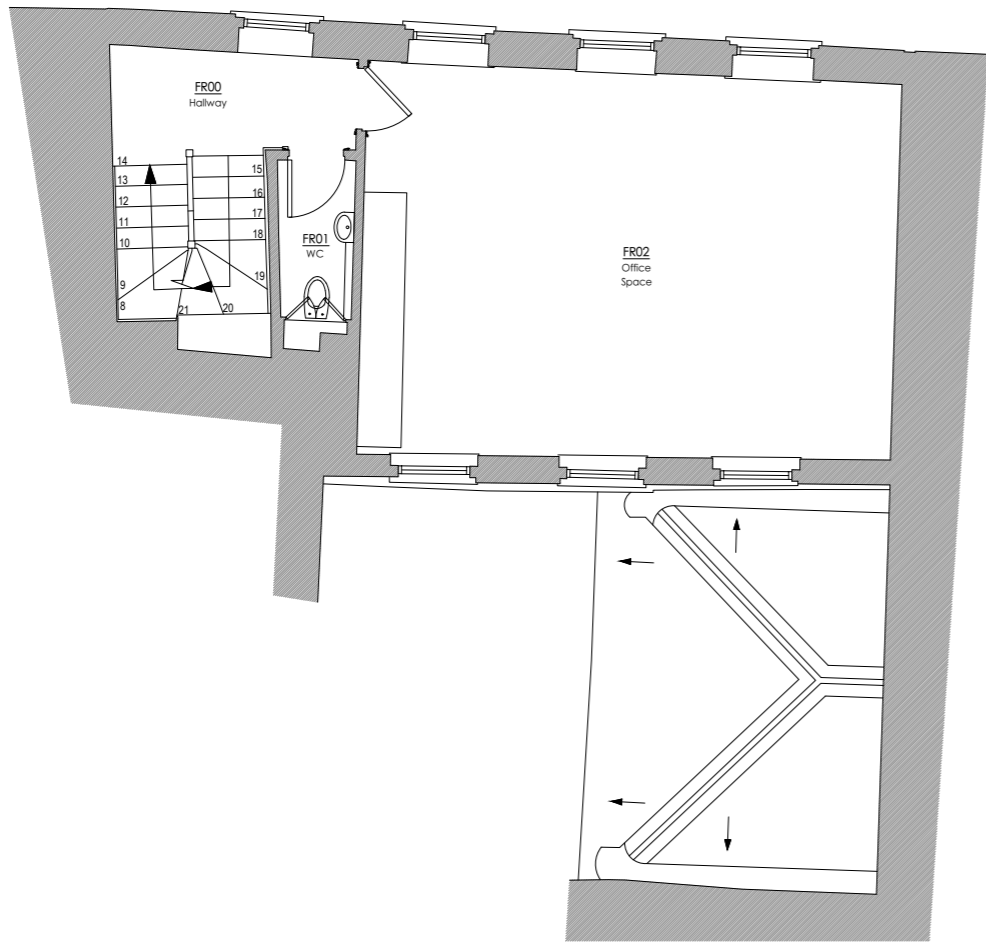


Existing first floor office space



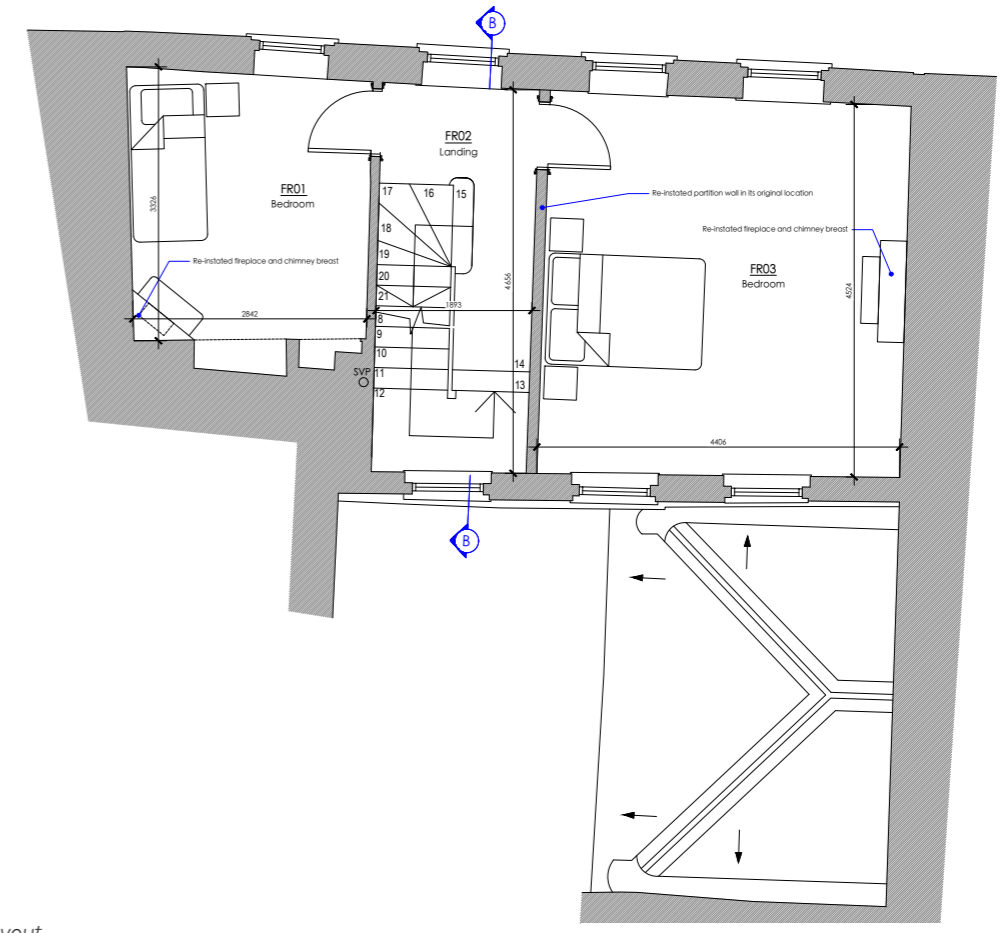
Existing cabinetry to be removed





Current First Floor Layout

NOTE:  
All new plaster finishes  
to be lath and plaster



Proposed First Floor Layout



## Second Floor Plan

The proposed work to the second floor aims at removing the existing modern partitions and restoring the historic fabric of the room.

The second floor has had the most recent internal alterations since the original scheme. Additional modern stud work partitions were constructed as part of 2012 planning application 12/2917/LBC to form an office storage and server space. The proposal removes these modern stud work partitions and as these stud work walls were not part of the original building, removing them won't have a negative impact on the historic fabric of the building.

As with the other floors, all walls and floors are to be replaced with timber/lath and plaster partitions as part of the works and to maintain the character of the building and introduce period appropriate ornate features, including corning, skirting etc.

New partitions on either side of the proposed central stair will form the master bedroom and bathroom.

There are no further changes.



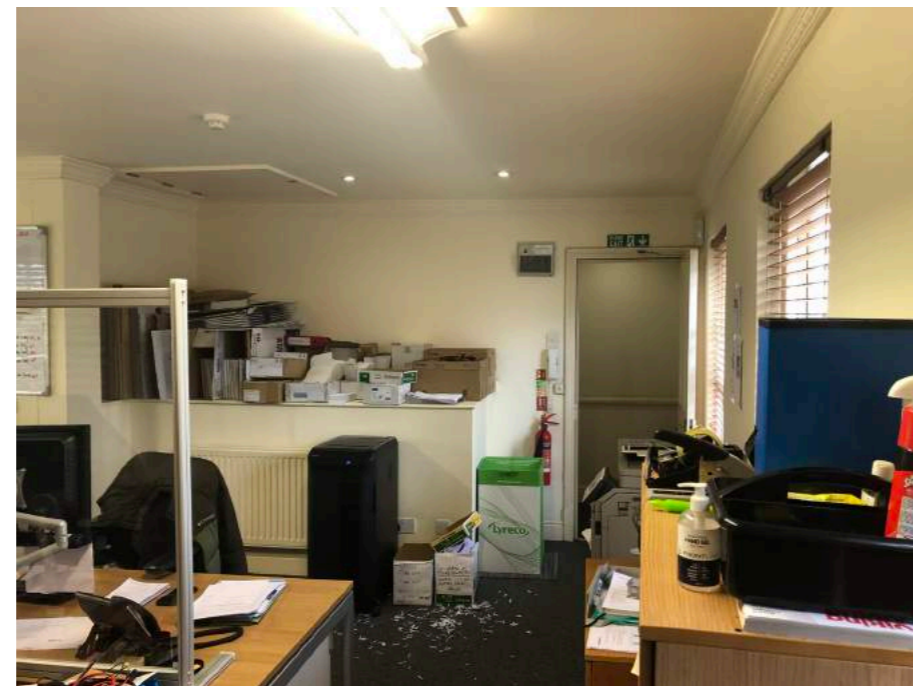
Existing second floor stair



Existing second floor stair



Existing office space



Existing office space

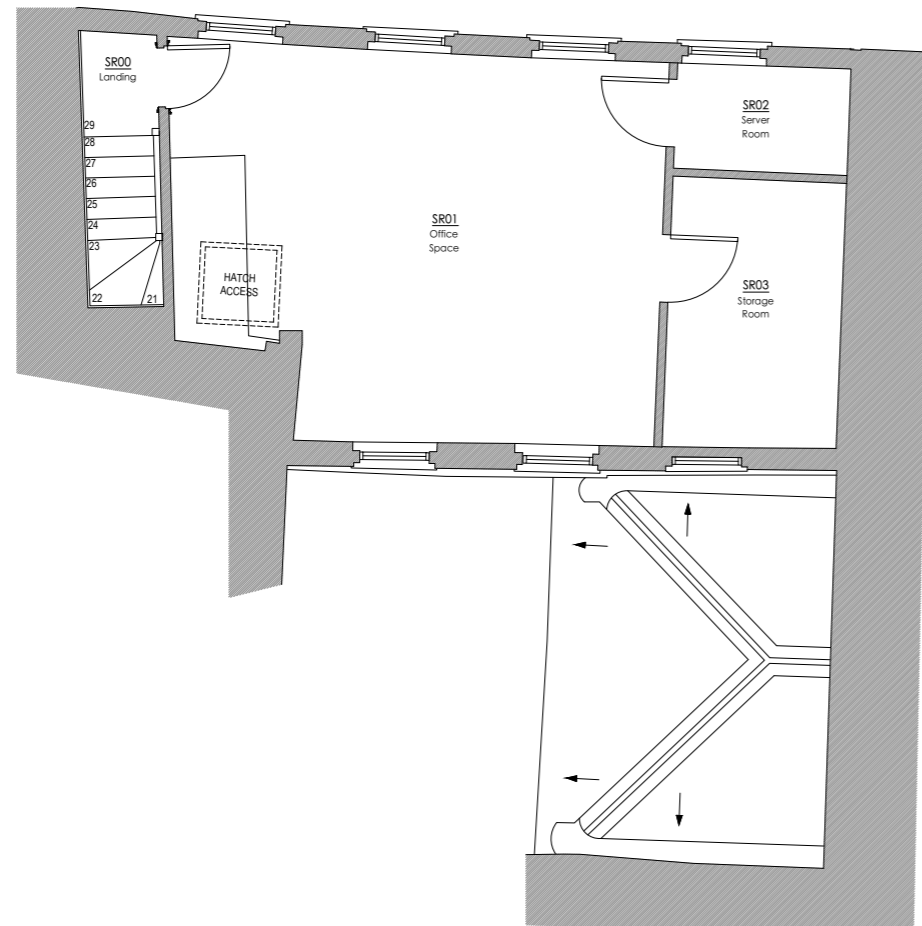


Existing server room

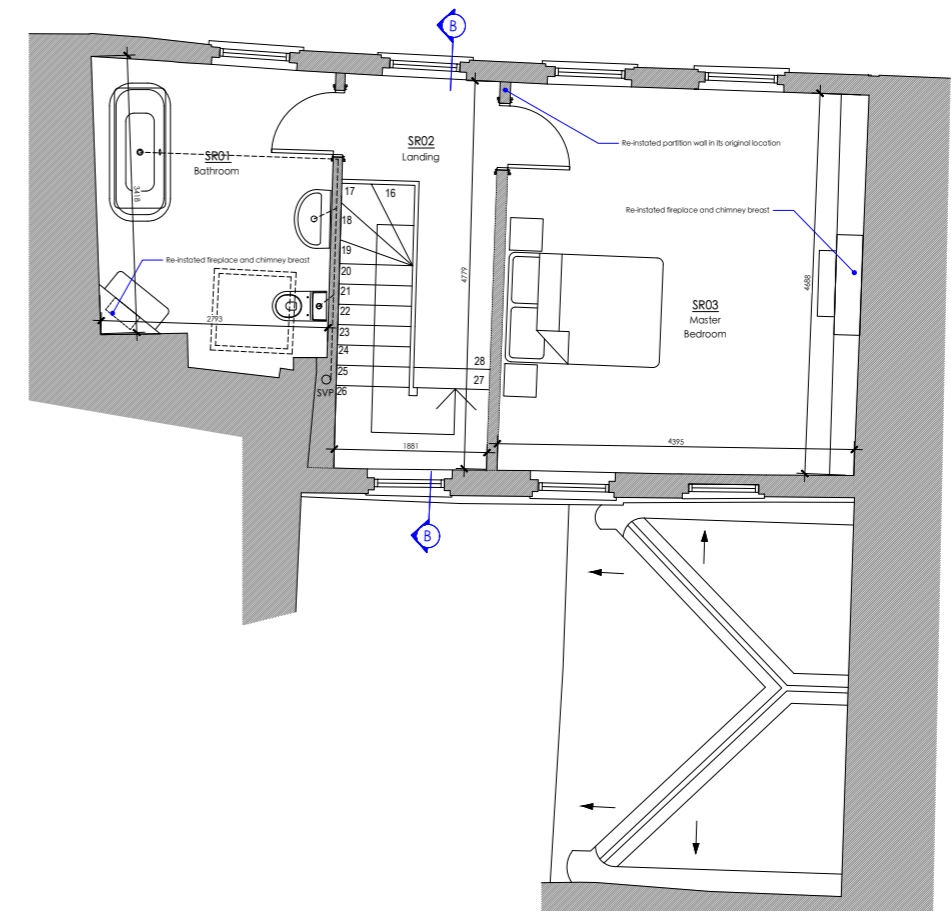


Existing joinery





Current Second Floor Layout



Proposed Second Floor Layout



## Roof Plan

The proposal is to retain the existing lead flat roof dating at least back to the early 20th Century. There is a modern (stainless steel) access hatch.

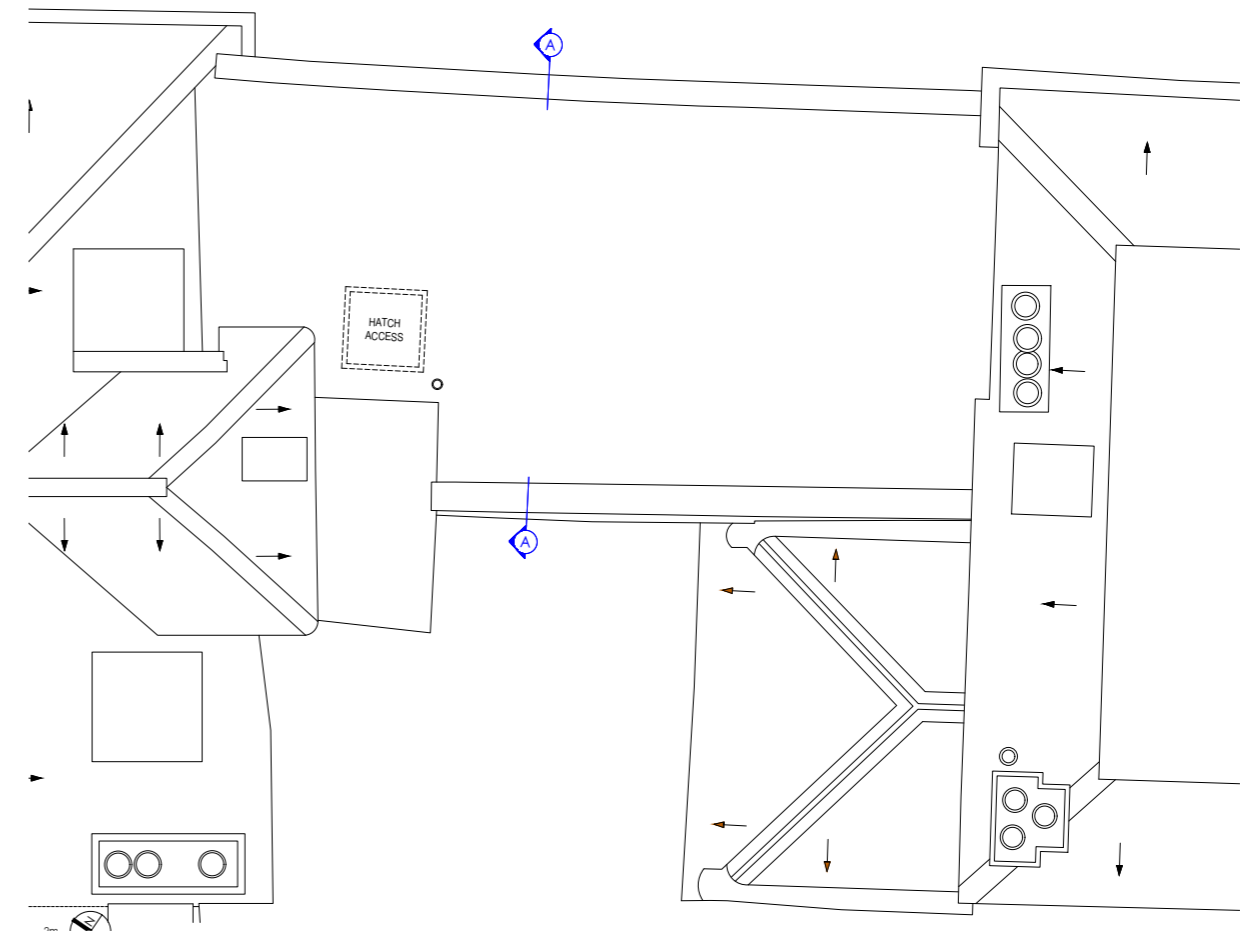
As defined in the energy report, we are proposing to insulate the existing roof in between the joists with easily removable loose wool insulation. It will not have any mechanical fixings or cause any damage to the existing roof structure. In addition, we are proposing PV panels and ASHP unit to be located on the flat roof, these are a part of the significant energy improvements we are proposing for this property. None of the equipment to be visible from the street level.

None of the equipment located on the roof would be fixed down onto the roof structure. We propose to have it ballasted meaning it would be held in place by the weight of ballast material. Structural engineer who produced the Structural Impact Assessment accompanying this application did not raise any concerns about this arrangement.

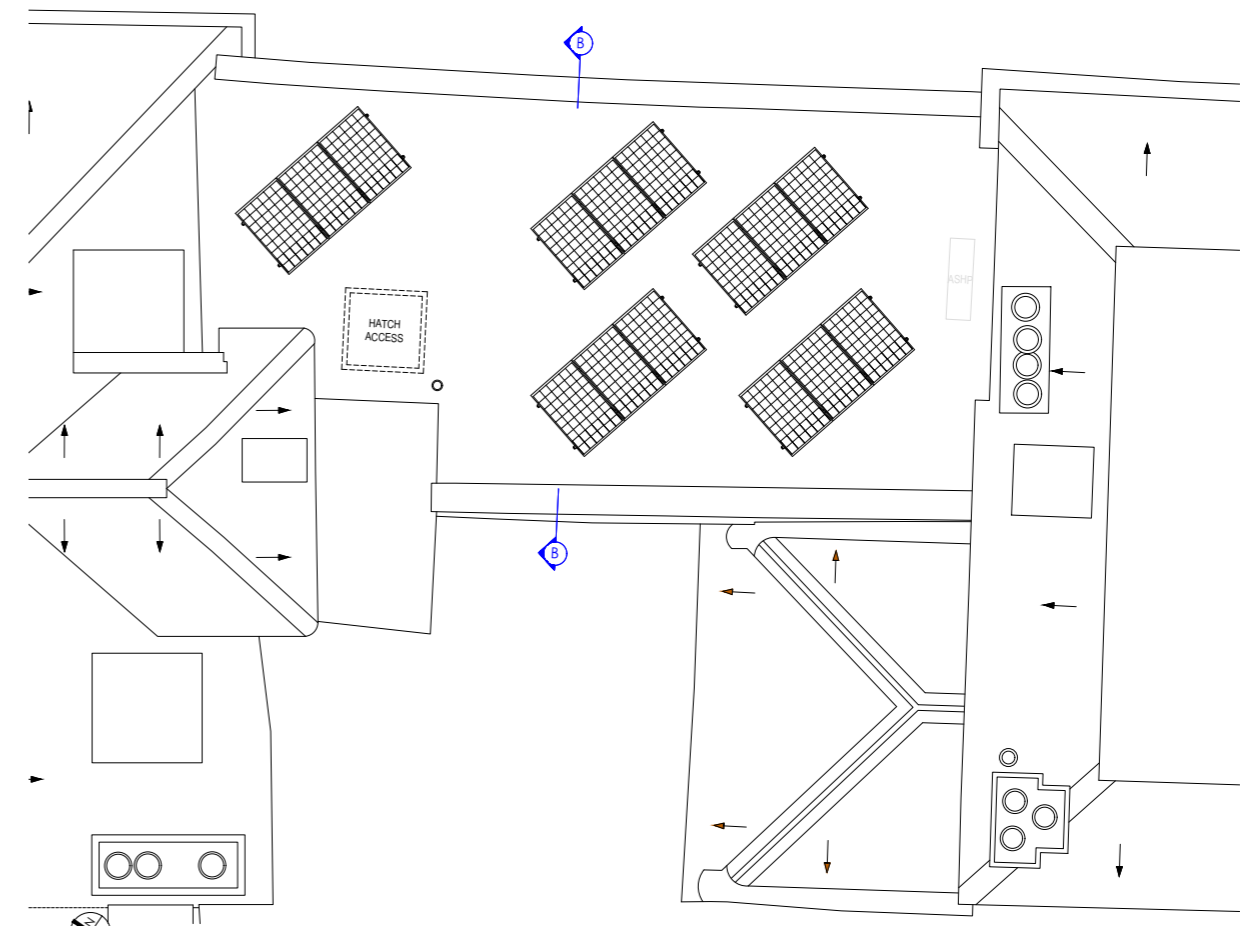
Ballasted approach would allow to locate the equipment on the flat roof without mechanically fixing into the roof deck. Any service penetrations through the roof deck would be via the aperture of the modern access hatch. If it was chosen to remove or replace any of this at a later date, the free-standing fittings could be removed without the damage to the flat roof or the listed building.



Existing roof plan - birds eye view



Existing Roof Plan



Proposed Roof Plan



## 7.4 Doors & Windows

All existing external doors and windows will be maintained and restored, with the exception of the modern door to the existing Ground Floor kitchen and modern windows to the rear extension, as stated on previous pages.

The proposed window to replace the modern door to the kitchen is to match the proportion, style and materials of the existing sash windows on the upper floors to maintain the character and balance of the elevation.

Existing sash windows to have flaking paint removed, cracks in wood filled with appropriate wood filler and repainted with traditional white linseed oil paint. No other alterations are proposed to the windows.



*Existing Sash Window Details*



## 7.5 Fixtures and fittings

All existing radiators are modern powder coated steel units. We propose to replace them with period appropriate cast-iron radiators that are hand painted. Radiators to be floor standing to avoid chasing any services into the historic masonry walls.

All surface mount fluorescent light fittings are to be removed and replaced by pendant lights. No wall lights and sockets are proposed on the external walls to ensure no chasing is done into the historic masonry.

We propose to reinstate the chimney breasts and fireplaces as per the images below and historical plans data.

All of these changes to fixtures and fittings contribute to the significance of the listed building. They are only possible via reversion regardless of owners personal preference.



Existing wall mount radiators to be replaced with period-appropriate cast-iron units



Proposed cast-iron radiators. Floor standing to prevent any damage to existing masonry walls by chasing in services



Fireplaces in principal rooms on ground and first floor to be larger and more ornate as per the image above.



Corner Fire Places and all fires on the second floor - proposed surrounds to match the above image which is a period piece in a nearby listed building that would be followed in design. It also features a small Georgian hob grate.



Existing light fittings to be removed



New lights to be pendants, no wall lights to avoid chasing into the historic masonry.



## 08. Sizes, Floor Areas, Overshadowing and Overlooking

The proposal does not include any reduction or increase to the current size of the building. Therefore, there are no overlooking or overshadowing issues to report. The proposed opening to the existing rear extension would not cause any overlooking issues.

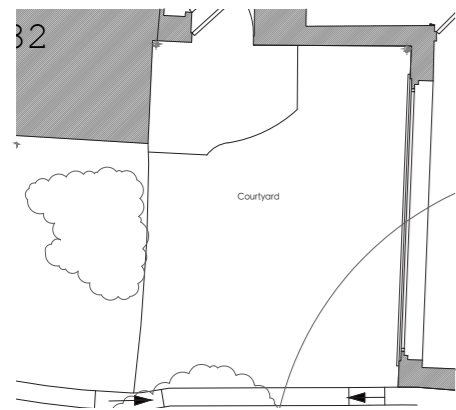
Existing building GIA area is 135sqm. This is to remain the same for the proposed as we are not proposing any extensions, nor demolishing any part of the building.

To sum up we are proposing 135sqm of commercial use floorspace (single unit) to become 135sqm of residential space (single unit) without any alterations to the size of the building.

## 09. Residential Standards

The London Plan Housing Design and Quality Standards require new home of 3 bedrooms housing 5 people to have GIA of at least 86sqm, provide 8sqm of external amenity, all bedrooms should be at least 2.15m wide.

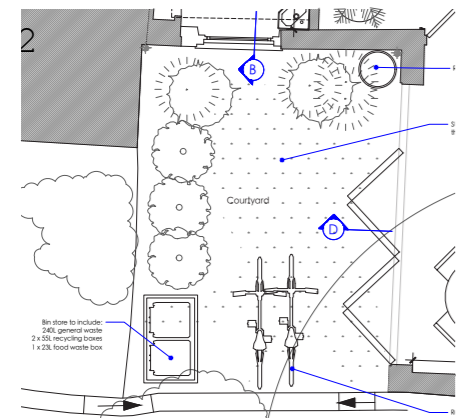
Our proposed development exceeds these requirements set out in London Plan. Proposed GIA is 135sqm, external space is 17sqm, under stair built in storage is more than 2.5sqm. Due to generous period layout, all bedrooms are wider than 2.15m. To sum up, our proposal to revert



Existing rear courtyard plan



Existing rear courtyard - view facing the rear elevation



Proposed rear courtyard plan



Existing rear courtyard - view from upper floor window

back into a single family dwelling is in excess of minimum space standards defined by the National Space Standard and London Plan. of the proposal.

## 10. Rear Landscaping

### Hard Landscaping

The existing modern paving to the rear courtyard are to be removed. It consists of modern

### Soft Landscaping

New decorative ornamental planting will be planted along the South-Western and Western boundary of the rear courtyard to add additional privacy to the space as well as make it feel more inhabitable.

All surfacing to be permeable and compliant with the specification set out in the arboriculturalist and BREEAM reports. Permeable paving will bring significant health benefits to the mature trees in the neighbouring rear gardens as described in the arboriculturalist report.

We propose permeable shingle surfacing in the centre of the rear garden.

Northern edge (bordering No32) of the garden to have ornamental planting alongside climbing plants onto the boundary wall as described in LBRuT Design Guidelines - Wildlife in Gardens. Area by the rainwater tank to have a low-maintenance ornamental plant. All planting recognised by RHS as beneficial to pollinators.

Climbing plant - Trachelospermum Jasminoides, - to be planted due to minimal roof spread. It's climbing to be encouraged via bamboo canes leant against the boundary wall, no physical fixings to be fitted. To be pruned every spring before may. Water weekly during the summer months.

Ornamental plant - Gypsophelia - to be planted due to suitability to local soil PH of Richmond Upon Thames areas bordering the river. To be pruned after spring and summer bloom when the whole plant is to be cut down to 30mm height above ground. Water weekly during the spring and summer months.

Ornamental plant - Ruscus Aculeatus - Position in area by the rainwater harvesting tank. Chosen for suitability for a darker corner receiving little direct sunshine. It is a native plant also recognised beneficial to pollinators by the RHS. To be pruned and have dead stems cut out every spring. Little to no additional watering required.

## 11. Lighting

We propose to remove all external modern light fittings as part of the facade renovation works. No upward light spill fittings are proposed.

## 12. Transport

Site is PTAL 6a, which is rated 'excellent'. Cycle storage provided for two bicycles in the rear garden. Cycle spaces to meet requirements set out in table 10.2 of the 2021 London Plan.

We are proposing the site to become car-free as part of s106 agreement as described in the transport statement and in line with paragraph 110d of the NPPF.



### 13. Refuse

Refuse bins to be located in a screened store at the rear courtyard not visible from the street. Store to provide sufficient space for:

- 240L of general waste
- 2x 55L recycling boxes
- 1x 23L food waste box

### 14. Access

The access to the building will remain as existing with the main access being from the pedestrian footpath. The property does not currently have vehicular access and the proposal does not intend to include any.

### 15. Sustainability

Although we would normally look to achieve BREEAM outstanding, we are unable to here as the building is Grade II listed; the historic and original parts of the building will be maintained and preserved, and this limits the BREEAM credits that could be achieved, particularly in terms of fabric upgrades. However, the proposals do afford the opportunity for some elements of BREEAM DR to be incorporated, along with other sustainable measures which are not included in BREEAM but would provide significant betterment when compared with the existing situation.

These include:

- Cycle storage in the courtyard
- Recycling bins and food waste boxes in a wooden store also located in the courtyard
- Legally harvested timber and responsibly sourced materials wherever appropriate
- New appliances will be energy efficient
- Internal water use will be in compliance with Approved Document Part G
- No increase hardstanding areas and therefore no increase surface water runoff
- The soft landscaping to the rear courtyard will include small trees and ornamental plants along the southern fence boundary which will enhance biodiversity.

As part of the application we are submitting BREEAM pre-assessment/exemption report from an accredited BREEAM assessor.

In addition to BREEAM pre-assessment we have produced an energy statement which concludes that we will achieve 54.46% reduction in CO2 over SAP Appendix S.

### 16. Marketing

As identified in the marketing report accompanying this application, prepared by an independent commercial agent, the data informing the pre-coronavirus policy and local plan of 2018 is not in line with the current market situation. Since the pandemic the number of remote workers had significantly increased and a number of people working from the office full-time has dropped. The London Borough of Richmond upon Thames, has the highest percentage of people working from home in London.

Subsequently, there is an oversupply of modern commercial office spaces in the immediate vicinity of the site. The spaces available are better suited to such use providing modern HVAC systems and large open plan layouts etc.

In sum, the independent market research and report shows how any Local Plan(LP) policy 41 concerns are assessed from the point of the current market situation.

### 17. Conclusion

Overall, we consider the proposal to preserve and enhance the character and the appearance of this outstanding Grade II listed building, while reinstating and restoring the original features, layout and use wherever possible.

Our aim is to improve the quality of living accommodation, by using high quality materials and finishes and respecting the original building fabric, both internally and externally, whilst making the proposals bringing back the historic layout alongside the series of benefits proposed.

The proposal reinstates original residential use to the historic building and brings very strong public benefits alongside significant heritage benefits to the listed building and the surrounding conservation area as a whole. The weight of the benefits is substantial and heavily outweighs the loss of the office. The loss of office was initially objected to within pre-application feedback in relation to policy LP 41, however, this was covered in the marketing reports supplied with this application meaning there are no further objections outstanding from the policy point of view.

We are confident in reinstating a listed house of high architectural merit, which continues to enhance the Richmond Green Conservation Area to its original use as a single family home. It is advised that an application demonstrates improvements that are only possible via reversion.