

PLANNING & HERITAGE STATEMENT

3 DUKE STREET, RICHMOND TW19 1HP

31 JANUARY 2023



DOCUMENT CONTROL

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| Project Title | 3 Duke Street |
| Client Name | Bricks & Fuel (Duke St) |
| Site Address | 3 Duke Street, Richmond, TW9 1HP |
| Report Title | Planning and Heritage Statement |
| Firstplan Ref | 22291/TA/je |
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SECTION 1 | INTRODUCTION

1.1 This Planning and Heritage Statement has been prepared by Firstplan, on behalf of Bricks & Fuel (Duke St), in respect of a planning application submitted to London Borough of Richmond (LBR) for the proposed redevelopment at 3 Duke Street, Richmond, TW9 1HP. This development seeks permission for:

Erection of 3 storey upwards extension to provide self-contained flats and associated works to ground floor shopfront.

1.2 The application site is an existing single storey commercial building within the Richmond Town Centre. The site has been vacant since the previous operator vacated the premises. The application proposal therefore seeks to make use of the airspace above the existing premises to provide residential accommodation, whilst upgrading the ground floor shopfront for a future commercial tenant. The aim of the proposals is to ensure that this part of the shopping frontage contributes to the vitality of Richmond Town Centre.

1.3 The proposals follow from pre-application advice sought from LBR received earlier in 2023. The final proposals have been amended and refined to respond positively to the pre-application advice and guidance provided. It has been carefully considered by the applicant and their design team to ensure the end result fits in with the surrounding area and benefits its neighbours.

1.4 This Statement should be read in conjunction with the architectural drawings and Design and Access Statement prepared by Design by Two, which detail the proposals in full. The application is also supported by a suite of documents to support the proposals.

1.5 This Planning Statement has been prepared to assess the proposals against the relevant provisions of the statutory Development Plan and other material considerations. This statement will therefore justify the principle and also assess all relevant development management considerations with appropriate mitigation proposed where relevant.

1.6 This Report adopted the following structure:

- **Section 2** sets out the relevant background information including the description of development and planning history;
- **Section 3** describes the application proposals;
- **Section 4** details the relevant planning and heritage policies against which the application should be assessed;
- **Section 5** assesses the acceptability of the application proposals in the context of the relevant planning policies; and
- **Section 6** draws the conclusions.

SECTION 2 | BACKGROUND INFORMATION

a) Site and Surrounding Area Description

- 2.1 The application site comprises a single storey, mid-terraced building located on the south-western side of Duke Street. The building itself has been operational at ground floor level as a restaurant and wine bar- the previous tenant vacated the premises in early 2023. The neighbouring property at no.2 Duke Street is a Public House and no.4 Duke Street is an office building. The site location is provided at Figure 1 below and further photographs are provided at **Appendix 1**.

Figure 1. Aerial Image of Site



- 2.2 The site lies within the Richmond Green Conservation Area, an area of mixed use and an archaeological priority area. The building is further designated as a building of townscape merit as are the majority of neighbouring buildings along Duke Street. Several properties to the north of the site fronting the nearby Richmond Green are designated as Grade II listed buildings.
- 2.3 The adjoining property at No. 2 Duke Street comprises a three storey building to the road frontage and drops down to part two storey, part-single storey to the rear. No. 3 previously provided the dining space for the public house however was converted into its own unit some time ago. The wider surrounding area is characterised by a mix of land uses. The properties located on the southwestern side of Duke Street all feature commercial uses at ground floor level, with residential uses generally operating above. To the northeastern side of the street, is a greater mix in ground floor uses, with a mix of residential and commercial uses, with residential properties occupying upper floors. Duke Street Church is also sited to this side of the street.

2.4 The site is located in a highly accessible area, with a PTAL rating of 6a. It lies a short distance from bus stops serving Eton Street and Richmond Station and is located 0.27km to the south of Richmond train station which has services to Central London and south. The site is identified within Flood Zone 1, and therefore has a low risk of flooding however is within a surface water flooding and critical drainage area. The site also lies within the Richmond Main Centre Boundary and Secondary Shop Frontage.

b) Planning History

i) Application Site

2.5 A desktop review of the planning history for the site has been carried out based on the information currently available on the Council’s online planning database. The database includes a number of historic applications for restaurant/ food and drink use. In addition it is noted that:

- Planning permission was withdrawn in November 2008 for the ‘erection of 3 storeys above existing restaurant to provide three 2 bed flats with external terrace. Alterations to shopfront and A3 restaurant at ground and basement level. Provision of a/c units at roof level’ (ref: 08/2826/FUL).
- Planning permission was refused in September 2009 for the ‘erection of part 2/part 3 storeys above the existing restaurant to provide five 1-bedroom flats. Alterations to shopfront and A3 restaurant at ground and basement floor level and provision of air conditioning units at roof level’ (ref: 09/1194/FUL). The application was refused on several grounds, including refuse and cycling, absence of planning contributions, design, impact on neighbouring amenity, traffic and highways and sustainability.

ii) Pre-application Advice Request

2.6 Paragraph 39 of the National Planning Policy Framework (NPPF, 2021) recognises that early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Prior to the submission of this application, the applicant undertook pre-application discussions with LBR in 2023 to discuss the development proposals.

2.7 The pre-application scheme sought an upwards extension to provide 3 dwellings and was registered by LBR under ref: 23/P0127/PREAPP. A pre-application meeting was held on 6 July 2023 with LBR Planning Office Mr Jack Davies.

2.8 The Council’s written feedback was received on 7 July 2023. The pre-application advice confirmed that LBR did not have an objection to the principle of the development. A summary of the comments made is presented in Table 1, below, alongside a brief explanation of how the points raised have been considered within the current scheme.

Table 1. Summary of Pre-application Written Advice

| Issue | Advice Provided | Applicant Response |
|---------------------------------|--|--|
| Principle of Development | <ul style="list-style-type: none"> • The proposals are for change of use of part of the ground floor to residential. • It is unclear if the current lawful use of the ground floor is purely with restaurant (class E) use or operates in conjunction with the neighbouring Public House. This should be clarified with evidence in any future submission. | <ul style="list-style-type: none"> • Additional information on the use of the restaurant has been provided in preceding sections of this report which confirm the restaurant has been separated from the public house for some time. • Ample space continues to be kept for the ground floor use and further justification for the minor loss of |

| Issue | Advice Provided | Applicant Response |
|----------------------------|--|---|
| | <ul style="list-style-type: none"> In either case, the current submission is for a minor loss of Class E/Public House floor space and it would appear that there remains ample space for either use to continue viable operation. The site is designated within a town centre location where a higher proportion of smaller units is sought. The scheme is for 2 x 2 bedroom units for 4 x ppl and 1 x 1bed unit. It is recommended that a larger proportion of smaller units is explored. The principle of residential dwellings on the upper floors is considered appropriate in this location. | <p>commercial floorspace provided in the following sections of this report.</p> <ul style="list-style-type: none"> The proposed unit mix has been amended to provide additional smaller units. |
| Design | <ul style="list-style-type: none"> The single storey height of 3 Duke Street is somewhat anomalous along the street frontage and there is no objection to the introduction two further storeys above the existing. The acceptability of a fourth storey, however, will depend heavily upon a suitable design that sits well within the context of Duke Street and at present this has not been demonstrated as part of the pre-app scheme. The proposals indicate a contemporary design and there is no objection to such an approach. However, the proposals would introduce a roof form that is entirely alien to the street. It would be a jarring feature, rather than sitting comfortably and complementing the context of the terrace of BTMs as a group. The prominence of the proposed rooftop storey would be further emphasised by the absence of a step back from the front façade, which would give it a looming presence to the street below. If a fourth storey is to be successfully accommodated within the site it would need to be stepped back from the front façade to minimise its presence in the street below and maintain a more lightweight approach to the structure. | <ul style="list-style-type: none"> The design approach has been further refined to ensure that the proposed fourth floor is stepped back further from the front façade. A glazed curtain wall is now proposed too which gives a lightweight appearance to the building. The second and third storeys retain a contemporary approach but regard has been paid to the traditional lower floor and surrounding area. |
| Residential Amenity | <ul style="list-style-type: none"> It does however appear from the floor plans that the development would extend past the balcony to No.2 and as such there is potential for the development to compromise the amenity of this property. Further information should be submitted with a future planning application, including the layout of No.2, compliance with BRE vertical and horizontal tests and a daylight and sunlight report would also be beneficial. | <ul style="list-style-type: none"> A Daylight Sunlight Report prepared by Planning for Sustainability has been submitted with the application with confirms compliance with BRE guidelines. The applicant is happy for a condition to be attached to a future consent which requires enhanced sound insulation between the commercial and residential element and that the sound insulation scheme should be |

| Issue | Advice Provided | Applicant Response |
|--|---|---|
| | <ul style="list-style-type: none"> It is noted that the development would be located above a restaurant and also directly adjacent to a public house. | <p>designed to achieve as a minimum sound insulation weighted standardised level difference of at least 60 dB DnT,w + Ctr.</p> |
| Sustainability | <ul style="list-style-type: none"> Any future application would need to include a completed Sustainable Construction Checklist and a statement to demonstrate that the new units would achieve maximum water consumption of 110 litres per person per day. | <ul style="list-style-type: none"> The Sustainable Construction Checklist has been submitted, alongside Energy and Sustainability Statements. |
| Parking Standards and Servicing | <ul style="list-style-type: none"> As the development is car free the applicant must mitigate impact on on street parking by entering into a legal agreement with the council under S106 of the Town and Country Planning Act 1990 which will preclude occupants of the site from buying permits to park in any CPZ. A development of 3 flats (5 bedrooms) requires suitable and sufficient space to store 360L of general waste, plus 1 x 240L paper/card recycling bin, 1 x 240L mixed containers recycling bin and 1 x 140L food waste recycling bin. The Waste SPD does allow developments of up to 4 flats, where dustbin based waste storage is impractical, to provide internal cupboards in each flat suitably sized to accommodate sack based storage for general waste (70L + 30L per bedroom), paper/card recycling (55L), mixed containers recycling (55L) and food waste (23L). The applicant needs to provide one secure cycle parking for 1 bed apartments and 2 spaces for 2 bed apartments (or larger) in accordance with the London Plan (2021). These need to be designed and built-in accordance with guidance set out in the London Cycle Design Standards. | <ul style="list-style-type: none"> This is accepted by the applicant. Details of separate waste stores for each dwelling on each floor has been provided. The location of the bike stores has been shown on the plans. |

SECTION 3 | PROPOSED DEVELOPMENT

- 3.1 The proposed scheme comprises the erection of three additional storeys above the existing, single-storey restaurant unit at ground floor level, to provide 4no. flatted dwellings, and other associated physical works to the existing ground floor to accommodate a new internal access and cycle storage area, and alterations to the existing frontage to accommodate an independent access to the new dwellings.
- 3.2 The resultant development would provide for 4no. residential flatted dwellings, the details of which are summarised within the accommodation schedule at Table 1 below:

Table 2. Accommodation Schedule

| Flat No. | Floor Level | Unit Mix | Floor Area (GIA) (sqm) |
|----------|-----------------|----------|------------------------|
| 1 | 1 st | 2B/4P | 98sqm |
| 2 | 2 nd | 1B/2P | 53sqm |
| 3 | 2 nd | 1B/2P | 54sqm |
| 4 | 3 rd | 1B/2P | 62sqm |

- 3.3 Working within the constraints of the retained existing building means that the residential units within the converted upper floors are not proposed to be provided with private amenity space, they will however be larger than minimum space standards to counter this. Public amenity space is available at the nearby Richmond Green.
- 3.4 Access to the residential dwellings is proposed from a new entrance on Duke Street, the commercial floorspace will be slightly reduced at ground floor level to create this. The residential entrance will include space for hanging and floor mounted bikes in the lobby area. The site is within an area of excellent accessibility (PTAL 6b/6a) and therefore it is proposed that the development will be car-free.
- 3.5 In terms of the appearance of the upward extension, this has been designed to complement the host building. The ground floor shopfront will be refreshed with a new traditional styled shopfront. This will include panelled doors/window.
- 3.6 The proposed palette of materials used across the upper floors primarily includes a mix of brickwork, with lead cladding and a glazed curtain wall to the top floor. The windows will comprise sash windows to the front to retain the traditional appearance and more modern styled windows to the rear. It is considered that the proposed materials will be in keeping with the surrounding area.

SECTION 4 | PLANNING POLICY CONTEXT

- 4.1 This section of the report discusses the key planning issues relevant to the application proposal in the light of the relevant planning policies and guidance.
- 4.2 The Development Plan Framework for the site comprises the London Plan (2021), the Richmond Local Plan (2018) and associated Policies Map. Consideration has also been given to the policy guidance detailed within the National Planning Policy Framework (NPPF) (2021) and any relevant supplementary planning documents from the GLA and LBR. The relevant planning policies from each of the documents summarised above are set out below.
- 4.3 LBR are also understood to be preparing a new Local Plan, with the Regulation 18 stage consultation taking place between 9 June and 24 July 2023. It is understood that the Council intend to submit the local plan in Jan/Feb 2024. However, there is no update on this yet.

a) National Planning Policy Framework (NPPF) (2023)

- 4.4 The NPPF provides the overarching planning policy guidance for development across England. It states:
- “The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.”*
- 4.5 **Paragraph 60** notes that in order to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed. Similarly, Paragraph 69 confirms that small and medium sites can make an important contribution to meeting the housing requirement of an area and can often be built-out relatively quickly.
- 4.6 **Paragraph 104** sets out that transport issues should be considered from the earliest stages of development proposals so that patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places.
- 4.7 **Paragraph 119** outlines that planning decisions should promote an effective use of land in meeting the need for homes and other uses, whilst also safeguarding and improving the environment and ensuring safe and healthy living conditions. Paragraph 120 also notes that decisions should promote and support the development of under-utilised land and buildings, especially where it would help to meet the need for housing.
- 4.8 **Paragraph 126** confirms that good design of one of the fundamental factors in ensuring sustainable development which can contribute to creating better places to live and work, and to help make development acceptable to communities.
- 4.9 **Paragraph 130** sets out that decisions should ensure that development proposals will create places that are safe, inclusive, and accessible and promote health and well-being with a high standard of amenity for existing and future users, whilst also functioning well and adding to the overall quality of the area.
- 4.10 **Paragraph 199** outlines that 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). Moreover, this is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

b) The London Plan (2021)

- 4.11 The London Plan is the overall spatial development strategy for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20 – 25 years. The overall strategy is for ‘Good Growth’ to promote sustainable development – including the use of previously development land and buildings in a design-led approach, ensuring development is accessible and takes into account physical constraints.
- 4.12 **Policy GG2 ‘Making the Best Use of Land’** outlines that in order to create successful mixed-use places that make the best use of land, those involved in planning and development must proactively explore the potential to intensify the use of land to support additional homes and workspaces.
- 4.13 **Policy GG4 ‘Delivering the Homes Londoner’s Need’** sets out that to create a housing market that works better for all Londoner’s, those involved in planning and development must ensure that more homes are developed.
- 4.14 **Policy D3 ‘Optimising Site Capacity through the Design-Led Approach’** highlights that development proposals should enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions.
- 4.15 **Policy D4 ‘Delivering Good Design’** notes that the design quality of development should be retained through to completion by ensuring maximum detail appropriate for the design stage is provided to avoid the need for later design amendments.
- 4.16 **Policy D5 ‘Inclusive Design’** outlines that development proposals should achieve the highest standards of accessible and inclusive design.
- 4.17 **Policy D6 ‘Housing Quality and Standards’** outlines that housing developments should be of high-quality design and provide adequately sized rooms with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures.
- 4.18 **Policy H1 ‘Increasing Housing Supply’** confirms that to ensure ten-year housing targets are achieved, boroughs should encourage development on other appropriate windfall sites not identified in Development Plans through the Plan period. Table 4.1 sets out the ten-year targets for net housing completions that each local planning authority should plan for. Richmond has a target of 4,110 housing completions between 2019/20 and 2028/9.
- 4.19 **Policy H2 ‘Small Sites’** highlights that boroughs should proactively support well-designed new homes on small sites (below 0.25 hectares in size) through both planning decisions and plan-making. Table 4.2 sets out the ten-year targets for net housing completions on small sites that each local planning authority should plan for. Richmond has a target of 2,340 net housing completions on small sites between 2019/20 and 2028/9.
- 4.20 **Policy HC1 ‘Heritage Conservation and Growth’** notes that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the asset’s significance and appreciation within their surroundings. Furthermore, development proposals should also avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.
- 4.21 **Policy T4 ‘Assessing and Mitigating Transport Impacts’** sets out that the cumulative impacts of development on public transport and the road network capacity including walking and cycling, as well as associated effects on public health, should be taken into account and mitigated.

c) Richmond Local Plan (2018)

- 4.22 The site is identified within the following relevant designations:

- Richmond Town Archaeological Priority Area;
- Richmond Main Centre Boundary;
- Secondary Shop Frontage
- Key Office Area;
- Richmond Green Conservation Area;
- Building of Townscape Merit;
- Richmond Town Centre CIL Boundary;
- Richmond Green Village Character Area.

4.23 **Policy LP1** requires all development to be of high architectural and urban design quality. In assessing applications, the Council will give regard to: (inter alia)

“compatibility with local character including the relationship to existing townscape, development patterns, views, local grain and frontages as well as scale, height, massing, density, landscaping, proportions, form, materials and detailing”

4.24 **Policy LP2** sets out that new buildings, including extensions and redevelopment, needs to respect the setting of the borough’s townscapes through appropriate building heights.

4.25 Part C of the policy states that:

“All proposals in Conservation Areas are required to preserve and, where possible, enhance the character or the appearance of the Conservation Area”

4.26 **Policy LP8** sets out that all development will be required to protect the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties.

4.27 Parts 1 and 3 seek to protect the amenities of neighbours with regard to daylight/sunlight and sense of enclosure respectively.

4.28 **Policy LP11** relates to the development of new basement levels and confirms that the council will resist proposals for extensions of more than one storey below the existing ground level.

4.29 **Policy LP20** sets out that new development should minimise the effects of overheating and minimise energy consumption. **Policy LP21** goes on to say that all developments should avoid, or minimise, contributing to all sources of flooding. **Policy LP22** supports retrofitting and reducing the carbon footprint of buildings.

4.30 **Policy LP24** confirms that all developments are required to provide adequate refuse and recycling storage space and facilities.

4.31 **Policy LP34** identifies that the borough’s housing target will be updated in line with the London Plan (see London Plan Policy H1 and H2). The Richmond area is identified as one of the areas where more housing can be located.

4.32 **Policy LP35** requires all new housing, including conversions, to meet minimum internal and external space standards. It goes on to confirm that the housing mix should be appropriate to the site-specifics of the location and that 90% of new build housing should meet M4(2) standards and 10% M4(3) standards.

- 4.33 **Policy LP36** requires contributions to affordable housing from all small sites. Part B(c) explains that on site below the threshold of 10 units, a financial contribution to the Affordable Housing Fund commensurate with the scale of development will be sought.
- 4.34 **Policy LP39** identifies that any infill and backland development must reflect the character of the surrounding area and protect the amenity and living conditions of neighbours.
- 4.35 **Policy LP45** requires new proposals to make suitable provision for accommodation of vehicles. In this regard the site has a PTAL score of 6a, one of the highest possible.

d) Supplementary Planning Guidance

- 4.36 The relevant London Plan SPGs are:
- Housing (2016)
- 4.37 The following LBR SPDs have been considered as part of the application:
- Affordable housing
 - Design quality
 - Planning obligations
 - Refuse and recycling storage requirements
 - Residential development standards
 - Richmond and Richmond Hill Village plan
 - Security by design
 - Sustainable construction checklist
 - Small and medium housing sites
 - Transport
 - Richmond Green Conservation Area Appraisal

SECTION 5 | PLANNING AND HERITAGE CONSIDERATIONS

5.1 This section assesses the proposed development in the context of relevant planning policy and has regard to the comments received during the pre-application stage for a similar scheme. The key issues arising for consideration in relation to the proposed scheme are as follows:

- Principle of the development and provision of residential dwellings;
- Dwelling mix and quality of residential accommodation;
- Design and impact on the surrounding streetscene and conservation area;
- Impact on existing amenity and future occupants amenity;
- Energy and sustainability;
- Transport and parking;
- Affordable housing and other obligations;
- Other relevant matters.

5.2 These considerations are addressed in turn below.

a) Principle of the Development

5.3 It is evident within National, London-wide and Borough planning policies that developments should aim to make the most effective use of land available, as well as strongly supporting the provision of new residential accommodation. This is emphasised within the NPPF where in which it is stated that Council's should promote and support the development of under-utilised land and buildings where land supply is constrained and available sites could be used more effectively, and support opportunities to use the airspace above existing residential premises for new homes.

5.4 Overall, it is clear that national and local planning policies strongly support the provision of new residential accommodation and enhancing the existing residential and commercial accommodation within accessible locations such as this (which benefits from good access to public transport and amenities). The Government have placed clear thrust in supporting upwards extensions through the introduction of Part 20 Class AB permitted development rights which allows new flats on terraced buildings in commercial or mixed use (shops and flats) subject to compliance with certain criteria. Whilst it is recognised that the site does not benefit from this right due to its location with a Conservation Area, the general emphasis of the policy position remains apparent.

5.5 With regard to the wider policy context, Policy H1 of the London Plan supports proposals which offer a range of dwelling sizes and types to meet current and future housing needs, i.e.4,110 housing completions between 2019/20 and 2028/9 within Richmond. Small sites are also considered beneficial given the relative pace at which they can be built out. Policy H2 (and Table 4.2) of the London Plan elaborates upon the valuable contribution of small sites development and specifically confirms that Richmond has a target of 2,340 net housing completions on small sites between 2019/20 and 2028/9. The contribution made by small and medium size sites is further acknowledged at Paragraph 69 of the NPPF. The application site should be considered as a small site due to the overall site area and PTAL. The site represents a real opportunity for additional residential dwellings in a suitable and accessible location and should be considered appropriate subject to other considerations.

- 5.6 Whilst the recent pre-application advice received from the Council related to an earlier version of the scheme, officers were largely supportive in principle. Indeed, the report states *“The principle of residential dwellings on the upper floors is considered appropriate in this location.”* The Council’s pre-application response also confirmed that the minor loss of existing Class E floorspace at ground floor level would not be of detriment to the use and ample space would remain for a future tenant. It is therefore expected that the same conclusions would be reached in respect of this element of the latest, proposed scheme and will agree that the proposals will maximise development at this underused site by introducing an upward extension to provide new high quality, residential units in a highly sustainable location.
- 5.7 The site is located in an area of Richmond where additional residential is specifically encouraged to help meet and exceed the Borough’s housing targets. The site as a whole has been in longstanding commercial use and is located within a predominately mixed-use area in character with commercial and residential units benefitting from excellent access to public transport (PTAL 6a), schools, health facilities and other general amenities. It is therefore considered to be an ideal and suitable location for new residential accommodation. The proposal will deliver 4 new residential flats within an urban area of Richmond, and therefore providing a valuable contribution to the Council’s housing stock.
- 5.8 Generally, it is considered that the application proposal will complement the existing uses as well as enhancing the offering within the surrounding area. The proposal will have a positive impact on the vitality and viability of this part of Richmond.

b) Dwelling Mix and Quality of Residential Accommodation

i) Quality of Accommodation

- 5.9 The internal layouts of the proposed residential units have been designed to comply with standards within the London Plan and individual rooms have been designed to comply with the Residential Design Standards SPD and prescribed space standards. It is therefore considered that the application proposals would offer an exceptional standard of living in accordance with local, regional and national planning policy. Overall, it is considered that the units have been carefully designed with amenity, light and outlook in mind, carefully responding to the constraints of the site. Indeed, the dwellings have been designed to create a high standard of living, dual aspect dwellings are proposed in as many flats as possible. Nevertheless, the flats all have a good amount of windows proposed. The final mix of units is considered to be appropriate for the sites constraints given limited amenity space opportunities expected for a family sized units. This is considered acceptable as there are nearby amenities areas surrounding the site including Richmond Green.
- 5.10 A Daylight/ Sunlight Report prepared by Planning for Sustainability has been submitted which demonstrates that there is sufficient internal daylight for the future occupants. Similarly due to the floorplates there is no overlooking or issues with privacy arising.
- 5.11 There is no lift proposed as part of the application proposals, however this is considered to be acceptable given that the proposal relates to development above an existing shop. Paragraph 3.7.6 of the London Plan confirms that where development is for specific small scale infill developments or flats above existing shops or garages flexibility on the provision of accessible housing can be had. It is considered that the benefits of the proposal (provision of much needed additional homes, provision of an attractive commercial unit and upgrading works to the site amongst others) outweigh the lack of accessible homes provided.
- 5.12 London Plan lobbies seek safe and secure design. All main entrances should be visible, clearly identifiable, and directly accessible from the public realm. The proposal includes a lobby area for the proposed residential dwellings which is designed to be safe and secure.

5.13 As per Policy D3 of the London Plan, the architects have taken a design-led approach to ensure that an appropriate development is delivered. Overall, the development is considered to provide high-quality accommodation given the connection to jobs, services, infrastructure and amenities by public transport, walking and cycling.

ii) Unit Mix

5.14 Taking into account the nature and constrained nature of the site and the aim to optimise housing potential, it is considered that the unit mix should be considered acceptable in this instance. The mix of unit sizes will introduce a variety of residential development which will make a valuable contribution to Richmond's housing stock. The pre-application responses stated: *"The site is designated within a town centre location where a higher proportion of smaller units is sought. The scheme is for 2 x 2 bedroom units for 4 x ppl and 1 x 1bed unit. It is recommended that a larger proportion of smaller units is explored."* The proposed unit mix has therefore been amended to seek a higher proportion of 1 bedroom units – the scheme should be supported on this basis.

c) Design and Impact on the Conservation Area

5.15 London Plan Policy D4 and Local Plan Policies LP1 and LP2 seek to promote new development that is of a high design quality. Both respective policies seek to ensure that development responds appropriately to its surroundings, and respects local context. Careful consideration has been given to the design of the proposals to ensure that it makes a positive contribution to the Conservation Area and enhances the visual appearance of the host building.

5.16 As outlined within the preceding sections of this statement, the design of the proposed scheme has slightly evolved since pre-application stage. Following feedback from LBR, the latest proposed scheme has been taken onboard officers comments as demonstrated within the enclosed drawings. The proposed fourth storey and roof form have been amended to be set back from the lower storeys. This reduces its prominence when viewed with its neighbours. The proposed material with a short glass balustrade and glass curtain wall glazing too assists its resultant lightweight appearance.

5.17 In terms of the height, the additional fourth storey has also been minimised to sit lower than its neighbours. There is a clear step down from Duke Street to the three storey public house and sit comfortably alongside its chimney. In addition to this, there is a break from the [arty wall with the public house to further limit mass and provide a visual break.

5.18 The proposed development has been designed to a high standard, providing a contemporary design solution that complements the existing character of the area. In terms of appearance, the residential units will be finished in a mix of brickwork and cladding – the timber has been removed from the scheme following officer advice. This will give the extension an individual identity that provides interest to the locality without appearing overly dominant. It is considered that the scheme respond to the scale, height and massing of neighbouring buildings and avoids visually competing with them, managing the changes in height between 2 and 4 Duke Street.

d) Amenity Impacts on Future Occupants and Adjacent Neighbours

5.19 In terms of the schemes impact on residential and neighbouring amenities, careful consideration has been given to the overall design to ensure that there is no detrimental impact on these elements, including on both existing and future occupants of the site. As detailed previously, the application has been supported by a Daylight Sunlight Report prepared by Planning for Sustainability which confirms acceptability in all regards.

- 5.20 Due to the nature of the building and the established floorplate there is no impact in terms of overlooking and privacy. Balconies have largely been removed from the scheme per suggestion by the Council, and where they do remain a screen is retained.
- 5.21 Officers were also concerned about the potential impact on the balcony at no.2. However as can be seen from the photos provided with the Design and Access Statement and this report, no. 2 does not benefit from a formal balcony. The flat roof area includes a number of services and a large raised skylight. It is therefore considered that this does not form an amenity space as there is limited space to comfortably sit/stand. Nevertheless, the scheme has been designed to be set back from the boundary with no. 2 where this balcony sits ensure that sufficient amenity is still enjoyed.
- 5.22 In addition, it is considered that given the surrounding area comprises similar uses (commercial units at ground floor with residential on the upper floors), the proposed use is compatible with the area.

e) Energy and Sustainability

- 5.23 An Energy Statement and a Sustainability Statement both prepared T16 are submitted in support of the application. The proposed development features improved insulation and air tightness standards, when compared against the compliance requirements of Part L 2013 of the Building Regulations. In addition, energy efficient lighting is to be provided throughout the dwellings in excess of the Part L1 2013 requirements. Additional recommended measures included within these reports include MVHR, Air Source Heat Pumps and PV panels.

f) Transport

- 5.24 The site has an excellent level of Public Transport Accessibility (PTAL 6a). The site is located within close proximity to a number of bus stops situated on Eton Street and The Quadrant and Richmond Train Station is located just 0.29km to the north of the site and located within close proximity to a number of shops and other services. As such, it is proposed that the scheme will be 'car free' and as agreed at the pre-application stage, will mitigate any impact on on-street parking by entering into a legal agreement or planning condition which will preclude occupants of the site from buying permits to park in Controlled Parking Zone 'A1 – Richmond Town'.
- 5.25 In addition the proposed scheme will include provision of 6no. secure cycle storage spaces located internally at ground floor level in the form of ground-level and hanging storage to serve the new residential units. This is therefore considered to be in accordance with the London Cycle Design Standards and London Plan requirements.
- 5.26 Servicing of the residential and commercial uses will be from the surrounding street as per existing.
- 5.27 Given the setting, it is understood that commercial waste is left on the street on the collection day with an internal store created by the tenant. This is proposed to be retained. A similar situation is proposed for the residential dwellings. The location of each residential bin store to meet LBR standards is provided internally outside each dwelling.
- 5.28 On this basis, it is considered that the site will continue to be easily accessible and future occupants of the site will continue to have access to a variety of sustainable modes of transport. With regards to deliveries associated with the ground floor commercial use, these will remain unchanged and unaffected as a result of the proposals.

g) Affordable Housing and Other Obligations

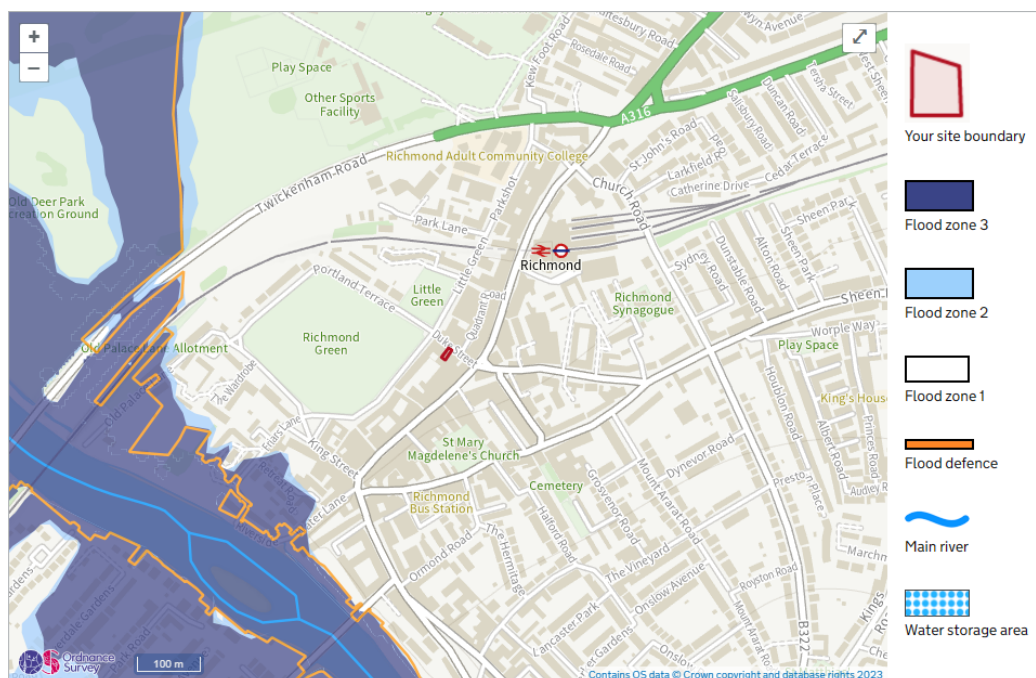
5.29 In line with the Council's affordable housing requirement, the scheme would be required to provide 15% or 0.45 affordable units. The viability of this is being considered and a statement prepared by S106 Management is submitted with the proposals. We look forward to discussing this further with officers.

h) Other Matters

iii) Flood Risk

5.31 As confirmed within Figure 2 below, the application site lies within Flood Zone 1 and therefore is considered to have a low level of risk of flooding. The area immediately surrounding the site is built-up in nature and the proposed development area will be positioned alongside numerous other residential properties in the vicinity. The proposed flats are arranged over several floors, with no bedrooms at ground or lower ground floor levels, and therefore will not be susceptible to or at risk of flooding.

Figure 1. Flood Risk Map for Planning



5.32 The application is supported by a Flood Risk Assessment prepared by Lanmor Consulting. This concludes that there is a fluvial risk of flooding of less than 0.1% or (1 in 1000) year event. This also notes that in terms of surface water drainage for the proposed development, a blue roof drainage system will capture rainwater on the main flat roof of the building and attenuate the flow to the surface water sewer in Duke Street. Furthermore, runoff from the terrace areas located at third-floor level will discharge into the sewer at an unrestricted rate. The peak discharge rate for the entire site will therefore be restricted to a maximum of 1.9 l/s for the 1 in 100-year event plus 40% climate change allowances, which is a 59% reduction on the existing Brownfield rate. Therefore, it is not considered that there is insufficient capacity to successfully discharge runoff from the development.

iv) Fire Safety

5.33 London Plan policy D12 requires all development proposals to achieve the highest standards of fire safety, particularly for residential properties. As such, a Fire Statement has been prepared and included within the Design and Access Statement and submitted in support of this application to demonstrate compliance with this

policy and sets out a robust strategy for maximising fire safety and minimising the risk of fire within the development.

SECTION 6 | CONCLUSIONS

6.1 This application seeks planning permission for a three-storey extension to the existing single storey building to provide 4 no. residential dwellings at 3 Duke Street, Richmond, TW9 1HP.

6.2 This Statement has confirmed the following:

- maximise the efficient use of the site, providing high quality residential accommodation and rationalised, reconfigured commercial space at ground floor level. The proposed ground floor unit will appeal to a new tenant- to the benefit of the town centre and shopping area.
- The development proposals will result in an attractive residential development upgrading the shopfront for the existing commercial building and utilising the airspace above. This will improve the public realm, the wider conservation area, and offering within the general area whilst complying with and fulfilling national, London-wide and local planning policy objectives to increase the supply of new homes.
- The scheme will deliver 4 no. high-quality residential units on a well located and previously developed site which should be afforded substantial weight in decision making
- provide an appropriate mix of dwelling sizes with a high quality of accommodation for future occupiers in a sustainable town centre location. The proposals also preserve the amenity of existing, surrounding residents.
- The proposals include sufficient cycle parking provided in a safe and secure location. Similarly, sufficient refuse storage is provided in an accessible location. The location is highly accessible and sustainable-a number of bus services and trains station are within walking distance.
- be of a high quality design will serve to complement the town centre and character area. The proposed additional storeys are carefully designed to sit comfortably on the host building with a 'stepped' approach taken as well as relating well to the surrounding development.
- that the application is supported by a range of technical documents which confirm their acceptability in all other regards. This includes a Daylight/ Sunlight report which verifies that there is no issue in terms of daylight/ sunlight.

6.3 Overall, it is considered that the proposals will make a valuable contribution to the local area by improving this site, delivering new homes for the borough, improving the appearance of the building and the local character of the wider streetscape.

APPENDIX 1 | PHOTOGRAPHS OF SITE

APPENDIX 1: 3 DUKE STREET – SITE PHOTOMONTAGE

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