

PLANNING STATEMENT

In respect of

HAMPTON WATERWORKS

On behalf of

WATERFALL PLANNING LTD

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December 2023
FINAL

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Contents

1	INTRODUCTION	1
2	SITE AND SURROUNDINGS	4
3	PLANNING HISTORY	9
4	PROPOSED DEVELOPMENT	16
5	PLANNING POLICY	18
6	PLANNING APPRAISAL	25
7	HEADS OF TERMS	58
8	OVERALL CONCLUSIONS.....	59

Appendix 1 - Marketing Report 2020

Appendix 2 - Historic England Written Advice June 2023

Appendix 3 - Public Benefit and Intervention Summary

1 INTRODUCTION

1.1 This application for full planning and listed building consent is submitted on behalf of Waterfall Planning Ltd ('The Applicant'), for the redevelopment of the Karslake and Ruston & Ward Buildings at the Hampton Waterworks (the 'Site') in the London Borough of Richmond upon Thames (LBRT). The proposals are for:

“Conversion and extension of the site including Ruston and Karslake Buildings to provide 36 no. residential units (Use Class C3) and 318.8sqm flexible business space (Use Class E(g)), associated car parking, access and landscaping works.”

1.2 The application Site is located at the north-eastern part of the Thames Water's Hampton Waterworks at the corner of Upper Sunbury Road and Lower Sunbury Road. The 0.57 hectares Site was formerly used by Thames Water, who disposed of it in 2017 and vacated the buildings and surrounding land in December 2019. Thames Water retains the Ruston & Ward southern workshop and the filter beds to the south of the Site which remain operational.

1.3 The Site falls within the Hampton Village Conservation Area and comprises several designated and non-designated heritage assets. The Ruston & Ward Building and Karslake Building are Grade II listed; the Storehouse and the two Water Works Cottages are Buildings of Townscape Merit. A substantial part of the Site, particularly parts of the Karslake Building, has been vacant for nearly three decades and is in a dilapidated state.

1.4 It is proposed that the existing roof structures of the engine houses to the Ruston and Karslake Buildings are to be retained. Contemporary roof extensions are proposed for both buildings' 'low level boiler' house sections, and a two-storey extension to the rear of Karslake Building's east wing. The proposals retain and refurbish the two existing cottages, and a single storey extension is proposed to the Storehouse.

1.5 Previous applications (Local Authority References:20/1744/FUL and 20/1742/LBC) were refused under delegated powers on 4th August 2021 for the conversion and extension of the Site to provide 37 residential units and flexible business space. The 2020 scheme was refused on a number of reasons on land use/ affordable housing, heritage/ design, play space provision, transport/ highways safety, sustainability, flood risk/ SuDS, fire safety and ecology/biodiversity/ trees.

1.6 Following the refusal of the 2020 scheme, further pre-application meetings were held with LBRT and Historic England to assist in informing a revised scheme. The original scheme and the revised scheme have been subject to extensive pre-application discussions to determine the acceptability of the change of use, the level of intervention to the historic fabric of the buildings and the development's detailed design.

1.7 The revised proposals include the comprehensive refurbishment and redevelopment of the Site to provide 36 no. residential units (Use Class C3) and flexible business space (Use Class E(g)).

1.8 The proposal is for a high-quality, residential-led development sympathetic to the Site's historic value. It seeks to reverse the dilapidation of the buildings through providing uses that can be integrated most sympathetically within the buildings' fabric, whilst also being deliverable. The deliverability of the scheme has been assessed by confirming its optimum viable use.

1.9 A summary of the key changes to this revised scheme when compared to the refused scheme reference: 20/1744/FUL and 20/1742/LBC are as follows:

- Reduction of residential units from 37 to 36.
- Refinement of the roof extension design at the low-level boiler houses, with a lower pitched roof and fewer glazing panels.
- Provision of detailed identification and classification of heritage fabric.
- Placement of historic machinery in the grounds of the Site to raise public appreciation of the its architectural and historic interest.
- Installation of heritage information boards within the Site.

- Rear extension of the Karslake Building now has matching brick and recessed aisles to match the host building.
- Storehouse rear extension area reduced by 18%.
- Relocation of the children's play area to the rear of Karslake Pumphouse West
- Introduction of communal Air Source Heat Pump.
- Introduction of green roof at the Storehouse rear extension and the communal ASHP plant enclosure.
- Enhanced landscaping proposal including additional trees along the south eastern and northern boundary.

1.10 This Planning Statement sets out the key planning policies in relation to the site and assesses the proposed development against each of these policy considerations. This Planning Statement should be read alongside the following documents:

- Drawings, by LOM:
 - Existing floor plans, elevations, sections plan;
 - Existing window & door details;
 - Existing photo record of door and windows;
 - Existing fabric condition Survey;
 - Existing condition survey and schedule of repairs;
 - Demolition plans;
 - Proposed floor plans, elevations, section plans;
 - Proposed windows and doors details;
 - Proposed MVCHV strategy details;
 - Proposed enlarged sections plans;
- Accommodation Schedule – by units; by use; amenity, prepared by LOM;
- Urban Greening Factory Schedule, prepared by LOM;
- Design and Access Statement (including Landscaping Scheme, Inclusive Access & Wheelchair Housing Statement), prepared by LOM;
- Schedule of Materials and Finishes (internal and external works to listed buildings), by LOM;
- Construction Management Plan, prepared by LOM;
- Public Benefits & Interventions (listed buildings), prepared by LOM;
- Built Heritage Statement, prepared by RPS;
- Historical Building Gazetteer, prepared by RPS;
- Archaeological Desk Based Assessment, prepared by RPS;
- Ecological Appraisal, prepared by RPS;
- Biodiversity Net Gain Assessment, prepared by RPS;
- Tree Survey and Arboricultural Impact Assessment, prepared by RPS;
- Air Quality Assessment, prepared by Hydrock;
- Daylight and Sunlight Assessment, prepared by Hydrock;
- Energy Statement, prepared by Hydrock;
- External Lighting Assessment, prepared by Hydrock;
- Flood Risk Assessment, prepared by Hydrock;
- Foul & Surface Water Drainage Strategy, including London SuDS Proforma, by Hydrock;
- Basement Impact Assessment, prepared by Hydrock;
- Fire Statement including Fire Safety Strategy, prepared by Hydrock;
- Noise Assessment, prepared by Hydrock;
- Phase 1 Ground Conditions Desk Study, prepared by Hydrock;
- Structural Statement, prepared by Hydrock;
- Sustainability Statement and BREEAM Assessment, prepared by Hydrock;
- Sustainable Construction Checklist, prepared by LOM;
- Outline Utilities Strategy, prepared by Hydrock;
- Transport Statement, prepared by Markides Associates;
- Travel Plan Statement, prepared by Markides Associates;
- Servicing and Car Parking Management Plan, prepared by Markides Associates;

- Construction Logistics Plan, prepared by Markides Associates;
- Health Impact Assessment, including Healthy Urban Planning Checklist, prepared by RPS;
- Open Space, Public Open Space, Play Space and Playing Fields Assessment, by RPS;
- Planning Statement, prepared by RPS;
- Statement of Community Involvement, prepared by Polity;
- Marketing Report, prepared by Stirling Shaw; and
- Viability Assessment and Affordable Housing Statement, prepared by ULL Property.

1.11 The remainder of this Statement is structured as follows:

- Section 2 identifies key aspects of the site and its surrounding area;
- Section 3 provides an overview of the planning history and the pre-application discussions;
- Section 4 provides an overview of the development proposals;
- Section 5 sets out the relevant planning policy context;
- Section 6 provides a detailed assessment of the scheme;
- Section 7 sets out the likely planning obligations Heads of Terms; and,
- Section 8 provides an overall summary and conclusions.

2 SITE AND SURROUNDINGS

- 2.1 The Site is located on the south side of Upper Sunbury Road and west of Lower Sunbury Road, measuring 0.57 ha in area. Hampton Village and Hampton Rail Station is situated to the north of the Site, and it is within the jurisdiction of the London Borough of Richmond upon Thames (LBRT).

Hampton Waterworks

- 2.2 Hampton Waterworks were originally built in 1853-1855 and were the outcome of the Metropolis Water Act of 1852 which decreed that all abstracted water had to be filtered before use. Furthermore, fresh water for domestic use could not be extracted from the tidal reaches of the river Thames. As a result, water companies had to extract water above Teddington Lock and the first location above the lock with suitable land to accommodate the waterworks, was Hampton.
- 2.3 The large Hampton Water Treatment Works, operated by Thames Water, occupied the area between Upper Sunbury Road and the River Thames. The Waterworks include water treatments engine houses and pump houses, filter beds and water storage beds. The Waterworks is also adjacent to the Sunnyside and Stain Hill Reservoirs.
- 2.4 The Site is located at the north-eastern corner of the wider Waterworks site at the corner of Upper Sunbury Road and Lower Sunbury Road. The buildings on Site were surplus to Thames Water's needs for some time before the Site was sold on the open market to the applicant in 2017. Large parts of the buildings at that time were unoccupied becoming more and more in need of general repair and maintenance. Thames Water fully vacated the Site in December 2019. The two residential cottages were vacated in February 2020.
- 2.5 Thames Water retains the Ruston & Ward southern workshop, the filter beds to the south of the Site and the subterranean pipework, which remain operational. Thames Water require access through the southern access road of the Site for emergency and maintenance repairs.

The Site

- 2.6 The Site is located within Hampton Village Conservation Area and there are several designated and non-designated heritage assets on site. The Site consists of the following buildings:
- Ruston & Ward Building (Grade II listed) – located at the eastern part of the site;
 - Karslake Building (Grade II listed) – located at the western part of the site;
 - Storehouse (Building of Townscape Merit) – a single storey gatehouse;
 - 3 Water Works Cottages (Building of Townscape Merit); and
 - 4 Water Works Cottages (Building of Townscape Merit).
- 2.7 The cast iron railing between the corner of Lower Sunbury Road and east end of The Beam linking with the cast iron gate piers east of Ruston Building is also Grade II Listed.
- 2.8 The existing buildings on site have a total GIA of 2,125 sqm non-residential floorspace and 276sqm of residential floorspace.
- 2.9 Figure 1 below, prepared by LOM Architecture and Design, depicts the buildings on Site.

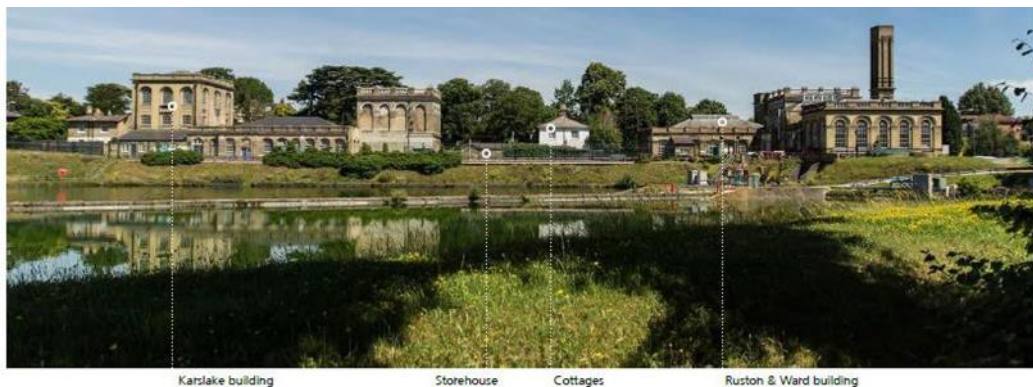


Figure 1: Buildings on Site

- 2.10 The existing buildings require extensive refurbishment and sensitive modifications to adapt to any new use now that Thames Water have no operational need for this part of the Site. The Ruston Building remains in an operational condition but will require major repairs to be carried out imminently to ensure that it remains watertight.
- 2.11 The Karslake Bull tower is dilapidated with major water penetration inside the building culminating in a large pond of approximately 10,000 gallons of foul water. There is substantial water damage throughout the building which is causing erosion at the foundations as well as cracks throughout. This building cannot be used by any parties until major structural works are carried out to the tower.
- 2.12 Set out below are the detailed description and photographs of the existing buildings on Site.

Ruston & Ward Building (Grade II listed) –

- 2.13 Ruston & Ward Building is a part one part two storey Grade II listed building. The single storey western part of this block formerly provided office and workshop space for Hampton Waterworks (Photo 1). The two-storey eastern part of the building was used as a workshop space and storage with a substantial internal void (Photo 2).



Photo 1 (Ruston Building- formerly Office/Workshop)

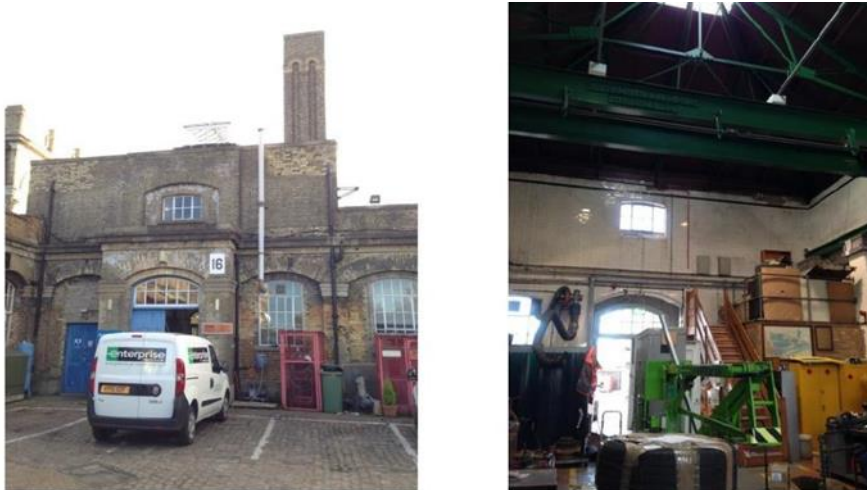


Photo 2 (Ruston Building- formerly workshop)

Karslake Building (Grade II listed)

- 2.14 The Karslake Building is a part one, part three storey collection of buildings. The building includes two former engine houses known as 'The Beam' (at the west end of the building) and 'The Bull' (at the east end) with a single storey infill in between the engine houses.
- 2.15 The two engine houses have been vacant for over 30 years and all the equipment contained within these two buildings has been removed. The Beam has several mezzanine floors (Photo 3); while The Bull has a substantial internal void without any internal floors and suffers from water damage (Photo 4). The single storey space between the engine houses was partially used as office and storage space by Thames Water personnel and their subcontractors (Photo 5).



Photo 3 (Karslake Building- The Beam)



Photo 4 (Karslake Building- The Bull)



Photo 5 (Karslake Building- single storey)

Storehouse (Building of Townscape Merit)

2.16 This single storey L shape storage gatehouse was previously used by Thames Water for storage purposes.

3 & 4 Water Works Cottages (Building of Townscape Merit)

2.17 Two x 3-bedroom, 2 storey semi-detached dwellings which are now vacant.



Photo 6 (Storehouse Building) and Photo 7 (Cottages)

2.18 The Site has a PTAL rating of 2 and is within walking distance (400m) to Hampton Railway Station. There are circa 20 car parking spaces within the Site.

2.19 It is located within Flood Zone 1 (lowest risk of flooding). There are a number of trees situated within the Site, but these are not subject to any Tree Preservation Orders.

2.20 The Site is currently accessed via a simple priority junction on Lower Sunbury Road which forms the main access to the Thames Water Hampton Waterworks. There are two existing closed vehicular entrances to the Site on Upper Sunbury Road. There is an existing pedestrian access point on Lower Sunbury Road.

Surrounding Context

2.21 The surrounding urban context is varied, with a mix of uses and building types.

2.22 As noted above, The Hampton Water Treatment Works, operated by Thames Water, is located to the south and east of the Site. Two further Grade II listed former Hampton Waterworks buildings are located to the east (Morelands and Riverdale Buildings) and were converted by Touchlight, a DNA specialist, to use as laboratory space and offices.

2.23 Residential dwellings adjoin the Site to the west and further residential properties and Hampton Library are located to the north.

- 2.24 The Site is within walking distance to Hampton Village to the north. It is within walking and cycling distance of a range of land uses which provide numerous amenities, including retail, leisure, health, schools, and community facilities. The enclosed Transport Statement outlines the range of amenities within walking and cycling distance of the Site.
- 2.25 It is also within walking distance (approximately 400m/ 6 minutes' walk) to Hampton Railway Station to the north. The Station is on the rail service between Shepperton and London Waterloo, and regular train services provide access to a range of destinations including Teddington, Kingston, Clapham Junction and Vauxhall.
- 2.26 The Site benefits from its proximity to bus services. A bus stop is located on Upper Sunbury Road, approximately 250m to the west of the Site. Another bus stop is located on Percy Road. Additional bus stops are also located at Hampton Rail Station (approximately 400m from the Site). The bus stops provide frequent service to a range of locations, including Heathrow, Kingston Upon Thames and Sunbury Upon Thames.
- 2.27 The Site is situated within the Hampton Village Conservation Area and there are several heritage assets situated within proximity of the Site, including:
- 5 Upper Sunbury Road - considered Statutorily listed because it is physically attached to the Grade II listed Karlake Building
 - 6-9 Upper Sunbury Road - Buildings of Townscape Merit
 - Morelands Building, Engine House - Grade II listed
 - Riverdale Building, Gate and Railings - Grade II listed
 - Cast Iron Railing between and including the Gateway to Thames Close and west end of Moreland Building - Grade II listed
 - Rose Hill House, Rose Hill (Hampton Library) - Grade II listed
 - Entrance Gates to Rose Hill House - Grade II listed
 - Rose Hill Lodge House - Building of Townscape Merit
- 2.28 The following section sets out the planning history of the site and its surrounding area, as well as the pre-application discussions, public consultation, and the resultant design evolution.

3 PLANNING HISTORY

3.1 This section sets out the relevant planning history and the pre-application discussions.

The Site

3.2 The Site has been subject to several planning applications in relation to its use as a water treatment facility at Hampton Waterworks.

3.3 The relevant planning permissions in relation to the Karlake House and Ruston Building are set out below, which relate to relatively minor alterations to the buildings.

Application Reference	Building	Description of Development	Decision (Date)
77/0435	Karlake	Demolition of Karlake Chimney Shaft and adjoining roof structure.	Approved 09/08/1977
79/1185	Ruston	Demolition and reconstruction in brickwork, to match existing, of parapet wall to 'The Ruston Garage'.	Approved 29/04/1980
80/1254	Ruston & Ward	Insertion of new windows and doorway with ancillary brickwork, to improve workshop facilities.	Approved 23/12/1980
07/0649/FUL 07/0650/LBC	Karlake	Internal and External Alterations to Karlake House to house electrical switch gear.	Approved 11/04/2007 (LBC) 12/04/2007 (Full)
07/3241/LBC	Karlake and Morelands	Renew existing slate roofs, flashings, weatherings, battens, box gutters linings. Refurbish lantern lights (to the Morelands and Karlake Buildings).	Approved 26/10/2007
09/2355/LBC	Karlake	Repairs to crane beam and replacement of cast iron stair treads and timber flooring at Karlake Beam & Store Building.	Approved 08/01/2010
20/1744/FUL 20/1742/LBC	Karlake, Ruston & Ward, Storehouse, 3&4 Waterworks Cottages	Conversion and extension of the site including Ruston and Karlake Buildings to provide 37 no. residential units (Use Class C3) and 318.8sqm flexible business space (Use Class E(g)), associated car parking, access and landscaping works.	Refused 04/08/2021

Table 1: Planning History for the Site

3.4 The most relevant planning history was that in June 2020, an application for planning permission (Ref. 20/1744/FUL) and listed building consent (Ref. 20/1742/LBC) was submitted for the whole Hampton Waterworks site for the following scheme:

“Conversion and extension of the site including Ruston and Karlake Buildings to provide 37 no. residential units (Use Class C3) and 318.8sqm flexible business space (Use Class E(g)), associated car parking, access and landscaping works”.

3.5 The application was subsequently refused on 4th August 2021. The reasons for refusal were as follows:

- Reason 1 (Land use/affordable housing)

In the absence of evidence to justify the failure to provide an adequate contribution of on-site affordable housing on what is a former employment site, there is an in-principle objection to the loss of industrial land use.

- Reason 2 (Heritage/Design)

The proposed development, by reason of its unacceptable overall bulk, scale, massing, and inappropriate design, would cause a high degree of harm to the setting of the site's listed buildings and conservation area. This harm is identified to be less than significant. The application is not considered to deliver public benefits of sufficient weight so as outweigh this harm.

- Reason 3 (Playspace provision)

The application fails to provide any details justifying the under-provision of on-site playspace and the Council does not consider that there are existing parks or play areas nearby which would be suitable, for which the Council might secure a financial contribution for improvements in order to provide off-site provision.

- Reason 4 (Ecology/Biodiversity/Trees)

In the absence of information regarding an adequate delivery of ecological enhancements, and failure to provide an acceptable bat survey, the application fails to protect and enhance biodiversity on site and within the adjacent Other Site of Nature Importance. Furthermore, the Council is not in receipt of a commitment to any replacement planting in the form of an outline landscape plan. As such, there is no current mitigation proposed for the loss of 6 trees on site. The car park fronting onto Upper Sunbury Road and conversion of soft planting space into parking is considered a loss of potential landscaping space and thus detrimental to the conservation area.

- Reason 5 (Sustainability)

The application would have an unacceptable impact on air quality and fails to meet air quality neutral standards for transport. In the absence of adequate mitigation measures, the application would deliver a non-policy compliant level of sustainable development in this regard. Further, the application does not demonstrate how the development would achieve a net zero carbon target, as required by the London Plan. The application also fails to provide a completed and signed Sustainable Construction Checklist, as required in the Local Plan.

- Reason 6 (Flood Risk/SuDS)

The proposed development fails to demonstrate that controlled waters would be adequately safeguarded from pollution. Moreover, with regards to localised flooding, the application fails to provide a screening assessment and Basement Impact Assessment for the application and consequently the application fails to demonstrate that the site can be developed without increasing throughflow and groundwater related flood risk.

- Reason 7 (Fire Safety)

In the absence of the submission of a Fire Statement, the application fails to demonstrate that the development would meet the highest standards of fire safety, and thus not compromise the fire safety of buildings and human life.

- Reason 8 (Transport/Highways safety)

The application fails to demonstrate provision of safe access from the development to Hampton Town Centre and Hampton Railway Station to the detriment of the free flow of traffic and in the interests of highways and public safety, contrary to the aspirations within the Mayor of London's Health Streets for London approach.

3.6 This application is a re-submission of the 2020 scheme where the above reasons for refusal have been addressed. This has been achieved by:

- Reason 1: The submission pack includes a viability report provided by U.L.L. Property which states that the proposed development now includes affordable housing provision.

- Reason 2: Following further consultation with the Council’s Heritage Officer, Design Review Panel, and Historic England between 2021-2023, the roof extensions have been refined further to reduce their visual impact by setting it within the existing roof ridge heights which presents a very minimal profile with deep overhanging eaves and shadow lines. The Karslake roof extension have also been pulled away from the pump houses to reveal more of the arched windows to the adjacent walls. The rear extension to Karslake and Storehouse has been refined following consultation. The internal configuration of the apartments is now a better reflection of the original fenestration layout. A Gazetteer of Heritage Fabric has been compiled that identifies the relative significance of fabric across the site. The revised proposals also seek to make the heritage assets more accessible and appreciable through site-based interpretation boards and the placement of the pumphouse machinery within the grounds, to ensure that those using the Site and passing by will have an opportunity to explore the history of the buildings and understand their significance.
- Reason 3: The scheme would have the on-site provision of doorstep play area for under 5s within the site, which is located to the rear of Karslake Pump House West. Appropriate provision of older children play space will be determined through further discussions with the local authority.
- Reason 4: The submitted Ecological Appraisal now includes a Preliminary Bat Roost Assessment and Bat Emergence Survey. The submission pack also includes an Arboricultural Assessment that includes mitigation for the proposed loss of trees.
- Reason 5: An Air Quality Assessment was undertaken in accordance with the London Plan 2021. It found that building emissions from the Proposed Development are air quality neutral, however total transport emissions were above the transport emission benchmarks and further mitigation is required and suggested, which will be implemented including a Travel Plan and net zero carbon contribution. A completed and signed Sustainable Construction Checklist has been submitted as part of the revised scheme.
- Reason 6: The revised application is submitted alongside a Basement Impact Assessment (BIA) although there are no proposals to create new basements or to alter existing basement areas. The submitted BIA sets out that the proposed drainage strategy is a betterment compared to the existing surface water arrangement and the proposal would not present any land stability issues. Given that the basements are existing there will be no consequential loss of flood storage space. it is therefore concluded that there are no adverse impacts due to the proposed basement conversion.
- Reason 7: This application pack includes a London Plan Fire Statement, which provides an evacuation strategy and details on the proposed active fire safety measures for the development.
- Reason 8: The development proposals include the introduction of a pedestrian crossing on Upper Sunbury Road, following consultation with TfL and Highways. New pedestrian survey and collision data, as well as an Active Travel Zone Assessment, have been included to support the Transport Statement.

Surrounding Area – Morelands and Riverdale Buildings

- 3.7 The adjacent former Hampton Waterworks site to the east, the Morelands and Riverdale Buildings, was granted planning permission for the ‘restoration and refurbishment of listed buildings to create B1 accommodation, car park and servicing, ancillary cafeteria and staff facilities, landscaping, electricity substation and replacement security building’ in May 2014 (ref: 13/2047/FUL).
- 3.8 Morelands and Riverdale buildings were vacant following their closure for operational purposes by Thames Water in 2012. The development proposed their refurbishment and repair to provide facilities for new research laboratories and offices, which are within Use Class E(g).
- 3.9 The key considerations for the application were the safeguarding and enhancements to the listed buildings and a continued commercial use which was considered appropriate for the site.

- 3.10 It should be noted that Morelands and Riverdale Buildings are occupied by a specialist DNA therapeutics business company, Touchlight, utilising the building's large internal spaces as research laboratories and offices. It is likely that other typical 'offices or employment uses would not have found this space to be suitable for accommodation. Thus, Morelands and Riverdale Buildings were uniquely equipped to accommodate this particular specialist operator.

Planning Use Class

- 3.11 The Site comprises buildings that have been in operational use as fresh-water waterworks by Thames Water, with residential properties (the Cottages) that have been historically used in association with the waterworks.
- 3.12 The planning history for the site has been outlined above. There is no reference within the planning history to a specific Use Class.
- 3.13 According to the Land Use Gazetteer, there are a number of definitions that can be applied to water works related uses. These are:
- Water treatment plant, wastewater – Class B2
 - Water treatment works – Sui Generis
 - Water-management development (not by Environment Agency) – Sui Generis
 - Waterworks buildings other than plant – Sui Generis
- 3.14 Accordingly, it is considered that the lawful use of the site comprises a **Sui Generis** use as a water treatment works with ancillary office/ workshop and 2 no. residential units. This is confirmed in the original application (ref: 20/1744/FUL) officer's report which stated that the site has '*a Sui Generis lawful use with a wide mix of uses being incorporated on site with B2 (general industrial) being the most prevalent use*'.

Scheme Evolution

- 3.15 The scheme has been subject to extensive pre-application discussions since 2017.
- 3.16 Further information on how the detailed design has evolved over the course of extensive pre-application discussions with the Council, following feedback from public consultation, and further consultation with Historic England following the refusal of the original scheme, is provided within the Design & Access Statement and the accompanying Statement of Community Involvement.

Pre-Application Meeting 1 - August 2017

- 3.17 A pre-application concept meeting was held between the applicant and LBRT on 1 August 2017 in relation to the proposed redevelopment of the Site.
- 3.18 At the concept meeting, LOM Architects presented a mixed-use redevelopment scheme to provide approximately 800sqm of office floorspace and 34 residential units, through the erection of roof extensions to the two listed buildings and a new 3 storey building at the location of the two existing cottages.
- 3.19 During this meeting, the Council officer made reference to the emerging Local Plan Review Policies LP41 and LP42, stating that there was a presumption against the loss of employment floorspace. In this respect, it was stated that any change of use to residential should be supported by two years' marketing evidence, which demonstrated that there was no demand for B1, B2, B8 or community uses.
- 3.20 Following the 2017 meeting, the design team resolved to establish the form and type of development that would likely be deliverable on the Site in relation to both viability and feasibility. In order to identify the main constraints and to optimise land use, expert employment agency advice was sought, in addition to heritage consultancy and viability input.

Pre-Application Meeting 2 - October 2018

- 3.21 The pre-application scheme proposed the refurbishment and extension of the buildings including installation of mezzanine floors, roof extensions and rear extensions to provide 43 residential units and 280sqm of office floor space. The previously proposed new building was omitted from the scheme, with the retention of the two existing residential cottages.
- 3.22 A site visit was attended by the design team, the Conservation Officer, and Planning Officer to inspect the condition of the buildings on Site and to discuss the potential alterations and improvements to the listed buildings.
- 3.23 The Council considered the Site to have a Sui Generis lawful use with a wide mix of uses being incorporated on site with B2 (General Industrial) being the most prevalent use. The pre-application response received in May 2019 continued to raise in-principle concerns over the loss of employment and industrial floorspace and advised that marketing evidence would need to be provided in line with the requirements set out within Local Plan Policy LP42.
- 3.24 The pre-application response advised that it was considered that the proposed roof extensions would result in harm to the fabric of the listed buildings and the character and appearance of the Site and wider conservation area.
- 3.25 The design development of the scheme has significantly evolved since this advice was received in order to robustly address these previous comments.

Pre-Application Meeting 3 - March 2020

- 3.26 The number of residential units was reduced from 43 to 37 units, and circa 290sqm of flexible business floorspace was provided to enable the greater preservation of heritage spaces. The extent of the roof extensions was limited to the 'low level boiler house sections' of the Karlake and Ruston Buildings only.
- 3.27 At the pre-application meeting held in March 2020, the Council acknowledged and agreed that the marketing exercise that had been carried out, would address the requirement of Policy LP42 in relation to the loss of industrial land but further justification would be required against the policy requirement of Policy LP 40, to demonstrate that the employment floorspace had been maximised.
- 3.28 The Council raised comments in relation to the roof extensions; regarding their impact to the heritage value of the listed buildings and the external impact to Upper Sunbury Road. The detailed design of the roof extensions has been refined with a reduction to the eaves height to reduce its visual impact on the streetscape, and the introduction of moveable sliding shading devices to mitigate light spillage from the roof extensions.
- 3.29 The Council accepted the principle of a rear extension to the Storehouse but raised concerns on the scale of the two-storey addition. Subsequently, the Storehouse extension have been reduced to a single level only, but the unit remains as a 3 bed dwelling.
- 3.30 The Council stated at the meeting that there is a strong political preference to reduce car parking spaces to encourage sustainable travel and as such, encouraged the applicant to adhere to the car parking standards as set out in the Draft London Plan. As a result, the car parking provision on Site has been reduced from 42 to 39 spaces.
- 3.31 The Council commented on the loss of trees in relation to the setting of Ruston & Ward Building. An Arboricultural Impact Assessment has been prepared which confirmed that most of the trees proposed to be lost are low quality (Category C) specimens except for one Category B tree. New trees will be planted to the east of Ruston & Ward Building as part of the proposal.

Richmond Design Review Panel - June 2022

- 3.32 The 37 units mixed use scheme was presented to the Design Review Panel (DRP) on 15 June 2022. The Panel was pleased to see the proposal to re-use the redundant and cherished heritage assets, but they also acknowledged that the conversion of these historic buildings is very challenging.
- 3.33 The DRP make a number of suggestions to the scheme, namely:
- Fewer and larger units would have less strain on the conversion of the building in terms of splitting of spaces and provision of services

- Move the mezzanine floor further away from the windows
- The retention of the original cast iron glazing is supported
- Development of a Historic Gazetteer
- Ideally important features such as the crane should be retained in-situ
- Reconsideration on the design and materiality of two storey extension to Karslake Building
- The storehouse extension should be subservient to the original building
- Relocate the children play area to the south away from the road noise and pollution
- Retention of the original cobbled setting would reflect its industrial heritage

3.34 The DRP considered that the substantial harm to the existing heritage assets, caused by the loss of the existing roof, would need to be weighed against the public benefits of the proposal to bring into use a redundant heritage asset.

Pre-application written advice – February 2023

- 3.35 The number of residential units was reduced from 37 to 36 units and circa 303sqm of flexible business floorspace was provided.
- 3.36 The Council stated that the demolition of the ‘The Beam’ or western block of the Karslake Building, boundary pillars and wall, would not be appropriate as this would result in the unnecessary loss of historic fabric along the prominent perimeter on Upper Sunbury Road.
- 3.37 The Council accepted that the change of use to C3 and the physical conversion of the Karslake and Ruston & Ward Buildings would result in harm to the heritage significance of these structures but is unavoidable. However, in order to move forward, they stated that significant work would be required to minimise this harm and to bring about conservation and heritage benefits as part of the project.
- 3.38 The Council believed that the rear infill extension to the Storehouse may be acceptable, where it is designed sensitively and does not dominate the host building of Townscape Merit.
- 3.39 The Council stated that the formal application needed to show sufficient public and / or heritage benefits to outweigh this ‘less than significant’ harm as described above to Karslake Grade II Listed Building, the setting of Grade II Listed Buildings and the Hampton Village Conservation Area.
- 3.40 The viability financial assessment prepared by ULL was also reviewed by the Council’s appointed external viability consultant Bespoke.
- 3.41 Further discussions were held with the case officer in 2023. It was confirmed that the application did not need to be accompanied with an EIA screening. This is because the 36 residential unit and circa 300sqm commercial floorspace scheme is not located within any of the sensitive areas (SSSI, European sites, National Parks, AONB, the Boards, World Heritage Sites, Schedule monuments). The scheme also does not meet the threshold criteria in the EIA Reg Schedule 2, as it is less than 150 residential units and below the 1ha site for an urban development project.

Historic England Pre-Application Meeting– June 2023

- 3.42 Following concerns raised in previous consultations with Historic England, the proposal was revised in the following ways:
- Remodelling of proposed roof extensions over single storey sections of buildings;
 - Further design proposals for the rear extension to Karslake building; and
 - Further details of proposed impacts on heritage fabric, including a full gazetteer of heritage features with indicative proposals for those features.
- 3.43 Historic England noted that much had been done to address their previous concerns and that they would be unlikely to raise any objections should the proposals be submitted.

- 3.44 Whilst they still considered the proposed roof extensions to cause some harm to the significance of the listed buildings and the conservation area by reason of the loss of historic fabric and impact on the architectural composition of the host buildings, it was felt that this could be balanced against the recommendation with the provision of public benefits proposed.
- 3.45 Historic England supported the use of brickwork to clad the proposed extension to the Karlake Building that matches existing brickwork. They also recommended that the proposed window reveals are deeper in order to reflect the solidity and brickwork massing of the host building.
- 3.46 They recommended that the windows/doors providing access to the roof terrace over the rear extension to the Karlake Buildings reflect the metal treatment and general arrangement of the surrounding fenestration.
- 3.47 They acknowledged that the submitted documents provide much greater clarity on the proposals and their impact on the significance of the listed buildings.
- 3.48 If these proposals were to come forward for listed building consent, they would recommend that any grant of listed building consent be subject to conditions, including a salvage strategy relating to any elements of the buildings that are proposed to be replaced, indicating their reuse within the site. Historic England welcomed the reuse and display of a number of items relating to the original pumping station, including cabinets and equipment, and encouraged consideration of how these items may be displayed and interpreted in order to tell the story of the past operation of the building.

Public Consultation and Briefings – September 2019

- 3.49 A briefing of key members of the Hampton Society was held on 11 September 2019. A separate briefing of Ward Councillors (also attended by a local authority officer) was held on 13 September 2019.
- 3.50 A public exhibition to meet the community and introduce the proposals for Hampton Waterworks was held on 26 September 2019 between 3.30pm and 7.30pm at the Linden Hall Community Centre, Linden Road, Hampton. The public exhibition was attended by 87 members of the local community.
- 3.51 The feedback received as a result of this consultation showed that there was support for revitalisation of the historic Site to residential and commercial uses. Some visitors commented that the design was sympathetic, and there were no objections regarding the proposed roof extensions. The main concerns raised were about ensuring that there are sufficient levels of car parking and a safe access/ egress to the Site via Upper Sunbury Road.
- 3.52 Several attendees to the consultation expressed the desire to see a new pedestrian-controlled crossing on the Upper Sunbury Road. This particular request was considered by the Transport Consultant. However, it was considered, at the time, that there were sufficient pedestrian crossing facilities within the Site's immediate vicinity on Upper Sunbury Road and Lower Sunbury Road, including a pedestrian crossing and a pedestrian refuge island, which enabled safe crossing between the two sides of Upper Sunbury Road.

Public Consultation and Webinar – July 2022

- 3.53 Following the refinement of the refused scheme with the re-design of the proposed roof extensions and the refinement of the extension of the Karlake Building, a community letter was circulated inviting interested parties to attend a webinar of the revised scheme on 12th July 2022. There were 14 external participants including William Redfern, the Chair of the Hampton Society and Cllr Suzette Nicholson, Hampton ward councillor.
- 3.54 Some of the attendees expressed a desire to see affordable housing included in the scheme along with a pedestrian crossing on Upper Sunbury Road. Both elements now form part of the revised scheme.
- 3.55 The following section provides an overview of the final proposed development.

4 PROPOSED DEVELOPMENT

- 4.1 The proposals for the comprehensive refurbishment and redevelopment of the Hampton Waterworks site comprise the provision of 36 no. residential units and 318.8 sqm of Class B1 flexible business space.
- 4.2 As stated previously, the Site is surplus to Thames Water’s requirements. Therefore, appropriate alternative uses need to be found for the Site to ensure the long-term viable use of the listed buildings and an active beneficial use for the Site.
- 4.3 As set out in Section 2, the Site forms part of the Hampton Waterworks and the buildings were not designed or constructed for contemporary commercial in Class E, B2 or B8 employment uses. The Site is in Sui Generis use and did not provide a significant amount of employment. The existing buildings on site are dilapidated requiring extensive refurbishment and sensitive modifications to adapt to any new use.
- 4.4 Following the pre-application discussions, the key issues underpinning the redevelopment options are the impact on the Site’s heritage assets and the acceptability of the loss of employment land. Specialist advice on heritage, the employment market and the viability of different uses have been sought in order to explore and define the parameters for the scheme.
- 4.5 The architect and heritage consultants have carried out a detailed review of the condition and the character of the Site, with a focus on preserving and enhancing the character and setting of its heritage assets. It is considered that given the Site constraints, a residential-led mixed-use scheme is the most compatible use.

Proposed Development

- 4.6 The proposed mixed-use development seeks to provide 36 residential units (4,019.2 sqm) (GIA) and 318.8 sqm (GIA) of flexible business floorspace. The proposed unit mix would be:

Unit Type	Unit No.
1-bed	16
2-bed	11
3-bed	7
4-bed	2
Total	36

- 4.7 The proposed 318.8 sqm of employment use would be located at the eastern end of the Ruston & Ward workshop at the basement, ground and first floor levels. The design of the commercial space is proposed to be flexible and suitable for small and medium sized businesses. The commercial space will have its own dedicated pedestrian entrance off Lower Sunbury Road.
- 4.8 The proposed development comprises the following elements:
- Roof extension to single storey part of Ruston & Ward Building;
 - Roof extension to single storey part of Karslake Building;
 - New two storey rear extension to the Karslake Building’s eastern engine house;
 - New single storey rear extension to Storehouse;
 - Retention and renovation of the two residential cottages; and
 - Installation of mezzanine floors within the Karslake and Ruston & Ward Buildings.
- 4.9 The proposals also aim to restore the existing fabric, whilst providing contemporary sympathetic extensions to the buildings to incorporate new high quality floorspace. The scheme will seek to retain and highlight the industrial Victorian features wherever appropriate. The proposals also remove several poor quality twentieth century additions, which impact the buildings’ historic value.
- 4.10 The scheme will be served by communal Air Source Heat Pump (ASHP). There will be two plant enclosures. One is located in front of Karslake pumphouse west in a plant enclosure with sedum

roof, the second one is located behind the single store roof parapet between the Ruston & Ward pumphouse and workshop.

- 4.11 The scheme has been designed to include features which promote accessibility wherever feasible within the historic fabric. The proposals will provide 24 units which meet the Building Regulation requirement Part M4(2) 'accessible and adaptable dwellings', and 4 units will meet the Part M4(3a) 'wheelchair adaptable dwellings'. 8 of the units will meet the Part M4(1) 'visitable dwellings'.

Access and Parking

- 4.12 Currently the Site is accessed via Hampton Waterworks' main site entrance off Lower Sunbury Road to the southwest of the site. The proposal seeks to 're-open' the two existing unused access points on Upper Sunbury Road to provide direct access to the Site. The Site will have a one-way system with the eastern gate as access point and the western gate as egress. The proposed access and egress will have visibility splays compliant with relevant guidance.
- 4.13 The scheme will provide a total of 39 car parking spaces. 36 parking spaces will be allocated to residential use and 3 spaces for the commercial use. The parking spaces will be provided along the vehicular route, to the rear of Karslake Building and to the front of Ruston & Ward Building. Three of the parking spaces will be for blue badge parking.
- 4.14 A total of 85 cycle parking spaces will be provided. The Karslake Building ground floor bike store will comprise 41 spaces (double stacked and wall hung) and the Ruston & Ward Building will provide 22 spaces (wall hung). The Cottages and Storehouse have private cycle stores of 2 spaces for each dwelling house. There will also be 16 short-stay spaces situated in front of Karslake and Ruston & Ward Buildings and to the rear of the Ruston & Ward workshop.
- 4.15 Four external communal bin stores including recycling and waste bins are provided for the residential apartments. The Cottages and Storehouse will have private bin stores for each house. There will be a separate bin store for the commercial use.
- 4.16 All delivery and servicing activity including refuse and recycling collection will be accommodated within the Site.
- 4.17 Further information on the proposal is provided in the accompanying Design and Access Statement.
- 4.18 The following section outlines the relevant national, regional, and local planning policy context for the proposed development.

5 PLANNING POLICY

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires development proposals to be determined in accordance with the statutory Development Plan unless material considerations indicate otherwise.
- 5.2 LBRT's Development Plan is formed of the following:
- London Plan (2021);
 - LBRT Local Plan (adopted 2018); and,
- 5.3 LBRT Local Plan Policies Map (2015).LBRT adopted their Local Plan in July 2018, but two legal challenges were made regarding the adoption of the Local Plan. In March 2020, LBRT adopted the two matters which related to the legal challenges within the Local Plan.
- 5.4 LBRT published their Publication Version Local Plan (Regulation 19) in June 2023. Consultation on the emerging plan was open between 9 June to 24 July 2023. The emerging Local Plan was submitted to the Secretary of State where it will be examined between late summer 2023 to summer 2024. The expected adoption date is winter 2024/2025. Whilst the Council are minded to use the Publication Version Local Plan for the purposes of development management decision, it should be noted that the weight to be given to each of the emerging policies will depend on an assessment against the criteria set out in paragraph 48 of the NPPF.
- 5.5 The following policy guidance documents have also been considered:
- Mayor's Affordable Housing & Viability SPG (2017);
 - Mayor's Housing SPG (2016);
 - Mayor's Play and Informal Recreation SPG (2012);
 - GLA Characterisation and Growth Strategy LPG (2023);
 - GLA Optimising Site Capacity: A Design-led Approach LPG (2023);
 - GLA Housing Design Standards LPG (2023);
 - GLA Fire safety LPG (draft - consultation ended 2022);
 - GLA Affordable Housing LPG (draft - May 2023);
 - GLA Development Viability LPG (draft - May 2023);
 - GLA Urban greening factor LPG (2023);
 - GLA Air quality positive LPG (2023);
 - GLA Air quality neutral LPG (2023);
 - GLA Be Seen energy monitoring LPG (2021);
 - GLA Circular economy statements LPG (2022);
 - GLA Whole life carbon LPG (2022);
 - LBRT Affordable Housing SPD (2014);
 - LBRT Buildings of Townscape Merit SPD (2015);
 - LBRT Design Quality SPD (2006);
 - LBRT Planning Obligations SPD (2020);
 - LBRT Refuse and Recycling Storage Requirements SPD (2015);
 - LBRT Residential Development Standards SPD (2010);
 - LBRT Hampton Village Planning Guidance SPD (2017);
 - LBRT Sustainable Construction Checklist SPD (2016);

- LBRT Historic Buildings Maintenance and Repairs SPG (2005);
- LBRT Listed Buildings SPG (2005);
- LBRT Contaminated Land SPG (2003);
- LBRT Conservation Areas SPG (2002); and
- LBRT Planning Guidance Document Delivering SuDS in Richmond (2015)

5.6 The National Planning Policy Framework (NPPF), latest version published in December 2023, and the National Planning Practice Guidance (NPPG), which is an online resource, also form material considerations.

Site Designations

5.7 LBRT's Policies Map (2015) identifies the Site as being within the Hampton Village Conservation Area and Thames Policy Area. The Ruston Building is also marked as a Vista/Landmark location.

5.8 The Ruston & Ward Building; Karslake Building; and cast-iron railing between the corner of Lower Sunbury Road and east end of The Beam linking with the cast iron gate piers east of Ruston Building are Grade II listed. In addition, 3 & 4 Water Works Cottages and the Storehouse are Buildings of Townscape Merit.

5.9 Allocated Green Belt and 'Other Sites of Nature Importance' are located to the south of the Site. To the north is designated 'Other Open Land of Townscape Importance'.

5.10 The roads surrounding the Site are also designated within the Local Plan. Upper Sunbury Road (A308) is a primary/ secondary road and Lower Sunbury Road is a local distributor road/Crown Road.

National Planning Policy Framework (NPPF) (December 2023)

5.11 Paragraph 7 of the NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development, whilst paragraph 8 sets out the three dimensions to sustainable development: Economic, Social and Environmental. Paragraph 8 also states that these roles should not be undertaken in isolation, and it outlines that to achieve sustainable development, economic, social, and environmental gains should be sought jointly and simultaneously through the planning system. Paragraph 10 states that a presumption in favour of sustainable development is at the heart of the NPPF.

5.12 Paragraph 11 of the NPPF states that for decision-taking this means 'approving development proposals that accord with the development plan without delay' and where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:

- the application of policies in this Framework that protect areas or assets of importance provides a clear reason for refusing the development proposed; or
- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

5.13 In line with Paragraph 38 of the NPPF, Local Planning Authorities should approach decisions in a positive and creative way, and decision makers at every level should seek to approve applications for sustainable development wherever possible.

5.14 Paragraph 39 of the NPPF notes that early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community.

5.15 Paragraph 70 of the NPPF outlines that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and that local planning authorities should support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes.

- 5.16 Paragraph 85 of the NPPF outlines that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.
- 5.17 Paragraph 86 of the NPPF states that planning policies should set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration, whilst being flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.
- 5.18 Paragraph 123 of the NPPF encourages the effective use of land for new homes and other uses by reusing land that has been previously developed (brownfield land) and existing buildings. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land.
- 5.19 Paragraph 124 of the NPPF states that planning policy and decisions should:
- encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains;
 - give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land; and
 - promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.
- 5.20 Paragraph 128 of the NPPF also notes that planning policies and decisions should support development that makes efficient use of land.
- 5.21 Paragraph 135 of the NPPF states that planning policies and decisions should ensure that developments:
- will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
 - are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
 - establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
 - optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
 - create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.
- 5.22 Paragraph 200 of the NPPF states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.
- 5.23 Paragraph 203 of the NPPF states that in determining applications, local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; the positive contribution that

conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness.

- 5.24 Paragraph 205 of the NPPF notes 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). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
- 5.25 Paragraph 207 of the NPPF states that where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:
- a. the nature of the heritage asset prevents all reasonable uses of the site; and
 - b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
 - c. conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
 - d. the harm or loss is outweighed by the benefit of bringing the site back into use.
- 5.26 Where less than substantial harm is identified, Paragraph 202 of the NPPF requires this harm to be weighed against the public benefits of the proposed development, proposal including, where appropriate, securing its optimum viable use.
- 5.27 Paragraph 209 of the NPPF states that where an application will affect the significance of a non-designated heritage asset, a balanced judgement is required, having regard to the scale of harm or loss and the significance of the heritage asset.
- 5.28 Paragraph 212 of the NPPF notes that local planning authorities should look for opportunities for new development within conservation areas and within the setting of heritage assets to enhance or better reveal their significance. It emphasises that proposals that preserve those elements of the setting that make a positive contribution to, or better reveal the significance of, the asset should be treated favourably.

Relevant Policies

London Plan (December 2021):

- 5.29 The following policies within the adopted London Plan are considered to be relevant to the proposal:
- Policy D3: Optimising site capacity through the design-led approach;
 - Policy D6: Housing quality and standards;
 - Policy D7: Accessible Housing;
 - Policy D14: Noise;
 - Policy E1: Offices;
 - Policy E2: Providing suitable business space;
 - Policy E4: Land for industry, logistics and services to support London's economic function;
 - Policy E7: Industrial intensification, co-location and substitution;
 - Policy G5: Urban greening;
 - Policy G6: Biodiversity and Access to Nature;
 - Policy G7: Trees and Woodland;
 - Policy GG2: Making the best use of land;

- Policy GG4: Delivering the homes Londoners need;
- Policy GG5: Growing a Good Economy;
- Policy H1: Increasing housing supply;
- Policy H4: Delivering affordable housing;
- Policy H5: Threshold approach to applications;
- Policy H6: Affordable housing tenure;
- Policy H10: Housing Size Mix;
- Policy HC1: Heritage conservation and growth;
- Policy S4: Play and informal recreation;
- Policy SI1: Improving Air Quality;
- Policy SI2: Minimising greenhouse gas emissions;
- Policy SI3: Energy infrastructure;
- Policy SI4: Managing heat risk;
- Policy SI5: Water infrastructure;
- Policy T1: Strategic Approach to Transport;
- Policy T3: Transport capacity, connectivity and safeguarding;
- Policy T4: Assessing and mitigating transport impacts;
- Policy T5: Cycling;
- Policy T6: Car Parking;
- Policy T6.1: Residential parking;
- Policy T6.2: Office Parking; and
- Policy T7: Deliveries, Servicing and Construction.

LBRT Local Plan (2018)

5.30 The following local policies within Richmond's adopted Local Plan (LP) are considered to be relevant to the proposal:

- Policy LP 1: Local Character and Design Quality;
- Policy LP 3: Designated Heritage Asset;
- Policy LP 4: Non-Designated Heritage Assets;
- Policy LP 5: Views and Vistas;
- Policy LP 7: Archaeology;
- Policy LP 8: Amenity and Living Conditions
- Policy LP 10: Local Environmental Impacts, Pollution and Land Contamination;
- Policy LP 15: Biodiversity;
- Policy LP 16: Trees, Woodlands and Landscape;
- Policy LP 20: Climate Change Adaptation;
- Policy LP 21: Flood Risk and Sustainable Drainage;
- Policy LP 22: Sustainable Design and Construction;

- Policy LP 23: Water Resources and Infrastructure;
- Policy LP 30: Health and Wellbeing;
- Policy LP 31: Public Open Space, Play Space, Sport and Recreation;
- Policy LP 34: New Housing;
- Policy LP 35: Housing Mix and Standards;
- Policy LP 36: Affordable Housing;
- Policy LP 40: Employment and local economy;
- Policy LP 42: Industrial Land and Business Parks;
- Policy LP 44: Sustainable Travel Choices; and
- Policy LP 45: Parking standards and servicing.

LBRT Emerging Local Plan (Regulation 19) (June 2023):

- 5.31 LBRT have published their Regulation 19 emerging Local Plan in June 2023. Consultation on the emerging plan was open between 9 June to 24 July 2023. The emerging Local Plan was submitted to the Secretary of State where it will be examined between late summer 2023 to summer 2024. The expected adoption date is winter 2024/2025.
- 5.32 Whilst the Council are minded to use the Publication Version Local Plan for the purposes of development management decisions, it should be noted that the weight to be given to each of the emerging policies will depend on an assessment against the criteria set out in paragraph 48 of the NPPF. Particularly it was agreed by Full Council that no weight will be given to Policy 4 in relation to the increased carbon offset rate, and Policy 39 regarding 20% biodiversity net gain requirement at this stage.
- 5.33 The following draft policies within Richmond's emerging Local Plan are relevant to the proposal:
- Policy 1 Living Locally and the 20-minute neighbourhood;
 - Policy 2 Spatial Strategy: Managing change in the borough;
 - Policy 3 Tackling the Climate Emergency;
 - Policy 4 Minimising Greenhouse Gas Emissions and Promoting Energy Efficiency;
 - Policy 6 Sustainable Construction Standards;
 - Policy 7 Waste and the Circular Economy;
 - Policy 8 Flood Risk and Sustainable Drainage;
 - Policy 10 New Housing;
 - Policy 11 Affordable Housing;
 - Policy 12 Housing Needs of Different Groups;
 - Policy 13 Housing Mix and Standards;
 - Policy 19 Managing the Impacts of Development on Surroundings;
 - Policy 21 Protecting the Local Economy
 - Policy 22 Promoting Jobs and our Local Economy
 - Policy 23 Offices;
 - Policy 24 Industrial Land;
 - Policy 25 Affordable, Flexible and Managed Workspace;
 - Policy 28 Local Character and Design Quality;

- Policy 29 Designated Heritage Assets;
- Policy 31 Views and Vistas;
- Policy 33 Archaeology;
- Policy 34 Green and Blue Infrastructure
- Policy 35 Green Belt, Metropolitan Open Land and Local Green Space
- Policy 36 Other Open Land of Townscape Importance
- Policy 37 Public Open Space, Play, Sport and Recreation;
- Policy 38 Urban Greening;
- Policy 39 Biodiversity and Geodiversity;
- Policy 42 Trees, Woodland and Landscape;
- Policy 43 Floodlighting and Other External Artificial Lighting;
- Policy 44 Design Process;
- Policy 46 Amenity and Living Conditions;
- Policy 47 Sustainable Travel Choices;
- Policy 48 Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management;
- Policy 53 Local Environmental Impacts;
- Policy 54 Basements and Subterranean Developments; and
- Policy 55 Delivery and Monitoring

Hampton Village Planning Guidance (March 2017)

- 5.34 In addition to the above policies, the LBRT Hampton Village Planning Guidance seeks to establish a vision and planning policy aims for the Hampton Village area by identifying character areas.
- 5.35 The Guidance outlines that the Site is located within Character Area 8 (Hampton Waterworks). The Guidance notes that The Hampton Waterworks *presents “an impressive sequence of historic pump houses, arranged in regular intervals along Upper Sunbury Road. The Waterworks is still in use and the large reservoirs and filter beds that stretch down to the River Thames are fenced off yet visible from the main roads, presenting an open aspect that contrasts with the built-up areas to the north”*. The characteristic materials and features for this area include reservoirs, mature trees, metal fences, stock brick, red brick, render and clay tiled or slate roofs.
- 5.36 The Guidance states that development which harms and diminishes the industrial character of the buildings will be considered as a threat.
- 5.37 The document identifies there is an opportunity to enhance the character of the area by removing or redesigning fencing to improve accessibility and visual appearance. However, it notes that the historic railings near to the listed pump houses already make a positive contribution to the character of the area.

6 PLANNING APPRAISAL

6.1 The proposed development is for the:

“Conversion and extension of the site including Ruston and Karlake Buildings to provide 36 no. residential units (Use Class C3) and 318.8sqm flexible business space (Use Class E(g)), associated car parking, access and landscaping works”.

6.2 This section considers the proposals against the adopted and emerging planning policy context, covering the following:

- Loss of Existing Use
- Residential-led Mixed Use Development
- Affordable Housing
- Design and Layout
- Heritage and Views
- Quality of Residential Accommodation
- Unit Mix
- Amenity and Play Space
- Residential Amenity
- Inclusive Accessibility
- Daylight and Sunlight
- Noise and Vibration
- Transport, Parking and Servicing
- Trees and Landscaping
- Biodiversity
- Air Quality
- Flood Risk and Drainage
- Energy, Overheating and Sustainability
- Archaeology
- Contamination
- Utilities
- Fire Safety

Principle of Development - Loss of Existing Use

6.3 London Plan Policy GG5 encourages the need to plan for sufficient employment and industrial space in the right locations to support economic development and regeneration.

6.4 London Plan Table 6.2 categorises LBRT as one of the ‘retain capacity’ boroughs in terms of the management of industrial floorspace capacity. London Plan **Policy E4** states that any release of industrial land in order to manage issues of long-term vacancy and to achieve wider planning objectives, including the delivery of strategic infrastructure, should be facilitated through the processes of industrial intensification, co-location and substitution, and that releases should be focused in locations that are (or are planned to be) well-connected by public transport, walking and cycling and contribute to other planning priorities including housing (and particularly affordable housing), schools and other infrastructure.

- 6.5 London Plan Policy E7 part a) states that Development Plans and development proposals should be proactive and encourage the intensification of business uses in Use Classes B1c, B2 and B8 occupying all categories of industrial land through; the introduction of small units, the development of multi-storey schemes, the addition of basements and the more efficient use of land through higher plot ratios having regard to operational yard space requirements (including servicing) and mitigating impacts on the transport network where necessary.
- 6.6 London Plan Policy E7 part c) states that mixed-use or residential development proposals on Non-Designated Industrial Sites should only be supported where there is no reasonable prospect of the site being used for industrial and related purposes set out in Part A of Policy E4; it is an allocated site for residential or mixed-use development; or industrial, storage or distribution floorspace is provided as part of the mixed-use intensification. Mixed-use development proposed on Non-Designated Industrial Sites which co-locate industrial, storage or distribution floorspace with residential use should also ensure that:
- D-2) the industrial activities on site are not compromised in terms of their continued efficient function, access, service arrangements and days/hours of operation noting that many businesses have 7-day/24-hour access and operational requirements;
 - D-3) the intensified industrial, storage and distribution uses are completed in advance of any residential component being occupied; and
 - D-4) Appropriate design mitigation is provided in the residential element.
- 6.7 LBRT Local Plan Policy LP 40 states that the Council will support a diverse and strong local economy in line with the following principles:
1. Land in employment use should be retained in employment use for business, industrial or storage purposes.
 2. Major new employment development should be directed towards Richmond and Twickenham centres. Other employment floorspace of an appropriate scheme may be located elsewhere.
 3. The provision of small units, affordable units and flexible workspace is encouraged.
 4. In exceptional circumstances, mixed use development proposals which come forward for specific employment sites should retain, and where possible enhance, the level of existing employment floorspace. The inclusion of residential use within mixed use schemes will not be appropriate where it would adversely impact on the continued operation of other established employment uses within that site or on neighbouring sites.
- 6.8 LBRT Local Plan Policy LP 40 specifically states that the policy is concerned with uses within the B Use Classes and other sites which are Sui Generis use with a 'significant employment generating' floorspace. The policies make reference to the Council's Employment Land Study (2016), which indicates that a lack of sufficient employment floorspace provision is a constraint on future employment and business growth and therefore there is a presumption against the release of any employment land.
- 6.9 LBRT Local Plan Policy LP 41 supports a strong local economy and the Council will ensure there is a range of office premises within the borough, particularly for small and medium size business activities within the Borough's centres, to allow businesses to grow and thrive.
- 6.10 LBRT Local Plan Policy LP 42 states that the borough has a very limited supply of industrial floorspace and demand for this type of land is high. The Council will protect, and where possible enhance, the existing stock of industrial premises to meet local needs. The policy confirms that there is a presumption against loss of industrial land in all parts of the borough. A loss of industrial space (outside of the locally important industrial land and business parks) will only be permitted where:
1. Robust and compelling evidence is provided which clearly demonstrates that there is no longer demand for an industrial based use in this location and that there is not likely to be in the foreseeable future. This must include evidence of completion of a full and proper marketing exercise of the site at realistic prices both for the existing use or an alternative industrial use completed over a minimum period of two continuous years in accordance with the approach set out in Appendix 5; and then

2. A sequential approach to redevelopment or change of use is applied as follows:
 - 1) Redevelopment for office or alternative employment uses.
 - 2) Mixed use including other employment generating or community uses, and residential providing it does not adversely impact on the other uses and maximises the amount of affordable housing delivered as part of the mix.
- 6.11 The supporting text of Policy LP 42 also details that that the term ' industrial land' covers land use for general industry, light industry, warehouse, storage and distribution uses, as well as any other users within the B1c, B2 or B8 Use Classes or are considered to be Sui Generis, and land which does not fall within these use classes but is considered to contribute to the reservoir of industrial land in the borough, for example uses which support, contribute to, or could be drawn upon to meet the demand for industrial land.
- 6.12 LBRT Emerging Local Plan (2023) Draft Policy 21 seeks to retain and attract investment from existing and emerging sectors to support the existing business base and create a diverse and enterprising local economy. New proposals will be supported which protect existing employment floorspace for office use, with a no net loss approach. Proposals are expected to take an employment-led approach to any redevelopment for industrial use to meet local economic needs through intensification of the existing employment floorspace. Major new employment development is directed to the designated employment areas and to the town centres. Any major new development should explore the opportunity to create ground floor industrial provision to address local needs. Schemes should also provide a range of commercial unit types, that are flexible and adaptable to changing needs.
- 6.13 LBRT Emerging Local Plan Draft Policy 22 states that proposals for employment floorspace should support suitable workspace for the borough's locally significant and diverse sectors. Proposals for the re-provision of economic needs must provide a high standard of workspace which reflects the local economic needs and is of a design that enables use by a variety of different occupiers.
- 6.14 LBRET Emerging Local Plan Draft Policy 23 states that there is presumption against the loss of office floorspace in all parts of the borough. Any refurbishment of existing office floorspace should improve the quality, flexibility and adaptability of office space of different sizes.
- 6.15 LBRET Emerging Local Plan Draft Policy 24 states that there is a presumption against the loss of industrial land in all parts of the borough. Any redevelopment proposals are required to contribute to a net increase in industrial floorspace. Any refurbishment of existing industrial floorspace should include traditional formats along with workspace for light industrial, through intensification. New industrial space should be flexible and adaptable for different types of activities and suitable to meet the requirements of local businesses. The supporting text paragraph 19.28 defines industrial land as land use for industrial and warehouse uses Class E (g) (iii), B2 and B8 within Richmond borough. Land which is considered to contribute to the reservoir of industrial land in the borough, for example uses which support, contribute to, or could be drawn upon to meet the demand for industrial land, will also be provided in line with draft Policy 24.
- 6.16 LBRET Emerging Local Plan Draft Policy 25 requires the provision of affordable workspace within all major developments with over 1,000sqm of employment floorspace (gross).

Assessment – Loss of Existing Use

Existing Use

- 6.17 As stated in Section 3, it is considered that the lawful use of the Site comprises a Sui Generis use as a water treatment works with ancillary office/workshop and two residential units.
- 6.18 The existing buildings were built for the operational requirements of Hampton water treatment works. The majority of the floorspace, especially the three storey high pump houses of the Karslake Building and Ruston & Ward Building, were purposely built to accommodate the large engines and associated equipment for the waterworks which are now redundant.
- 6.19 The existing buildings were not built for general industrial use. They were built to provide operational infrastructure as a water treatment works, with ancillary offices and workshop as part of the waterworks operation.

- 6.20 The existing Site is not a significant employment generating floor space. In recent years, the numbers employed by the Waterworks on this part of the Site have declined due to improved technology. At the time Thames Water decommissioned the Site in December 2019, there were only 10 to 15 people working on the Site, the majority of which were working at the ancillary offices and workshop within the Ruston & Ward Building. This represents an employment density of 142 to 213 sqm per employee (existing non-residential GIA is 2,125sqm). This is a very low employment density and correlates with the operational infrastructure type use.
- 6.21 As part of the wider Hampton Waterworks, the existing buildings on Site were built for the purpose of functional infrastructure as a water treatment works. The Site in Sui Generis use clearly does not provide significant employment generating use, as evidenced by its operational infrastructure use and the low level of people who were employed on site.
- 6.22 In addition, none of the employment studies prepared by the GLA or LBRT considered Hampton Waterworks as an employment industrial site, nor does it fall within any allocated employment sites or Key Office Locations.
- 6.23 It should also be noted that the Site was previously an allocated site for mixed use redevelopment within the LBRT Unitary Development Plan (UDP) (2005) and the adopted Proposal Map (2015), site ref H1: Land and Buildings at Hampton Water Treatment Works' for 'Conversion of redundant Thames Water Buildings for business, residential and other compatible uses together with re-use of the associated filter beds and surrounding land'. Site allocation H1 noted that the eastern part of the treatment works is surplus to requirements, and that conversion of the listed buildings for mixed use development (business, residential and other compatible uses) is desirable to ensure their retention. It is also noted that such redevelopment would go outside and beyond the footprints of the listed buildings. However, the Site was not included as an allocated site within the adopted Local Plan (2018). It is assumed that the draft allocation was not maintained as Thames Water continued to require the Site for its operational purposes at that time.
- 6.24 The Site is a now a decommissioned infrastructure facility. It is therefore considered as a non-significant employment generating use and is not considered to fall within the definition of employment land or industrial land which Policies LP 40 and LP 42 seek to protect. It is noted that there are no policies protecting infrastructure such as water treatment works.
- 6.25 As noted in Section 2, parts of the buildings on site have been vacant for nearly three decades and have suffered from significant internal deterioration, whilst the remainder of the Site requires substantial refurbishment and investment to bring the buildings up to modern business standards.
- 6.26 The existing configuration of the former water treatments' infrastructure, the poor condition of the existing buildings along with restrictions to the alteration to the heritage assets, mean that the existing Site in its current condition is unsuitable for business, industrial or storage uses. The existing buildings, particularly the 3 storey blocks, are not suitable for adaptation for industrial use due to the different floor levels. Moreover, the Grade II listing status prohibits the modifications required for modern industrial occupiers, such as dock loading and access and the current site entrance is also too narrow for articulated lorries to enter.
- 6.27 Whilst there was some interest from other non-domestic users such as health clinics and nurser/creches, the Site's lack of sufficient outdoor space (e.g., school playground) and the lack of sufficient operational/ visitor parking for these uses rendered these options unfeasible. This marketing exercise has been undertaken since 2018 with no firm interest received from a wide range of different businesses.
- 6.28 Two Marketing Reports have been prepared to date, one by Martin Campbell which covered the marketing exercise between January 2018 and May 2020 (which was submitted as part of the application ref: 20/1744/FUL). A more recent one by Stirling Shaw which covers the marketing exercise between June 2021 and October 2023.
- 6.29 Notwithstanding the applicant's view that the Site cannot be categorised as employment land, as it is decommissioned infrastructure with a low employment level, this report assesses the proposals against the adopted Policies LP 40 and 42, and the emerging Policy 24.

Loss of Employment Land

- 6.30 NPPF Paragraph 120 part c) states that planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.
- 6.31 Local Plan Policy LP 40 states that land in employment use should be retained in employment use for business, industrial or storage purposes. Policy LP 40 part 4 states that *'In exceptional circumstances, mixed use development which come forward for specific employment sites should retain, and where possible enhance, the level of exiting employment floorspace.'*
- 6.32 Local Plan Policy LP 42 relates to industrial land and business parks. This states that the borough has a very limited supply of industrial floorspace and demand for this type of land is high. Therefore, the Council will protect, and where possible enhance, the existing stock of industrial premises to meet local needs. Part A of Policy LP42 states that a loss of industrial space (outside of the locally important industrial land and business parks) will only be permitted where robust and compelling marketing evidence is provided, and a sequential approach to redevelopment is applied, firstly for office or alternative employment uses; secondly, mixed use including other employment generating or community use, and which maximises the amount of affordable housing delivered as part of the mix.
- 6.33 LBRET Emerging Local Plan Draft Policy 24 states that there is a presumption against the loss of industrial land in all parts of the borough. Any redevelopment proposals are required to contribute to a net increase in industrial floorspace. Any refurbishment of existing industrial floorspace should include traditional formats along with workspace for light industrial, through intensification. New industrial space should be flexible and adaptable for different types of activities and suitable to meet the requirements of local businesses.
- 6.34 The sub-paragraphs below set out an assessment against these policies regarding the loss of employment land.

Marketing Evidence

- 6.35 In the 2021 officer's report for the application ref: 20/1744/FUL, the council considered the site to have an 'industrial' land use. The Council then assessed the submitted 2020 marketing report (Appendix 1) prepared by Martin Campbell to be robust and compelling evidence which demonstrated that there is no longer demand for commercial occupiers for this location in its current form, which meets the requirement of Policy LP42 in relation to the loss of industrial land.
- 6.36 In line with Policy LP42, a robust and compelling marketing exercise has been carried out since 2018. An updated 2023 Marketing Report prepared by Stirling Shaw sets out the latest marketing strategy that has been undertaken since June 2021, including details on how it was implemented, the advertised market rates and interest shown in the site. The Site was marketed for 'all enquires' including office/industrial/storage/warehouse. The site has been marketed since 2018, well over the 24 months period required by policy. Despite generating 43 enquires, there were no offers received to rent the site.
- 6.37 Stirling Shaw commented that after the UK emerged from Covid, businesses have been reviewing how they operate and what their future property requirements would be and they are cautious to commit to long leases. The storage and logistics markets bounced back relatively quickly post Covid due to the demand for online retailing and last mile logistics. Locally there has been sustained demand for small industrial units but tenants have been extremely cost sensitive and favour more suitable 'plug and play' options that allows tenant to move in and start trading with minimal cost and distribution to service. In comparison, Hampton Waterworks in its current form would require extensive modifications including substantial internal and external alterations to provide suitable accommodation. This prohibitively high fit out cost and low estimated rental value renders the existing buildings unviable for commercial use in its current condition.

Sequential Approach – offices or alternative employment / mixed uses

- 6.38 A sequential approach for the acceptability of a residential-led mixed use development on the Site has been applied based on the findings of the 2020 and 2023 marketing reports and the Design & Access Statement.

- 6.39 The 2020 marketing report assessed the suitability of the Site for industrial use. The report considered that the existing buildings on Site are dilapidated and are unfit of any purpose other than very basic storage on limited parts of the Site, as the listed buildings status prohibit the modifications required for industrial occupiers, such as levelled access/ goods lift, dock loading and access for lorries. The 2020 marketing report confirms that whilst there was limited demand from community uses such as health clinics, nursery/creche, educational or leisure occupiers at this location, there are a number of site-specific constraints that are likely to inhibit their occupiers, namely the lack of outside space for amenity and the need for additional parking facilities, and the listed building status.
- 6.40 The 2020 marketing report considered that the Site would be more suitable for B1(a) offices than industrial use, providing an office setting in character buildings at a prominent road-side location. However, prior to any alternative use, the marketing report commented that the existing buildings would require a complete strip out and comprehensive full refurbishment with the addition of mezzanine floors in the old pump house. The report also noted that the Site as a whole far exceeds any single occupier use and needs to be divided into smaller units to meet market demand.
- 6.41 The 2023 Design & Access Statement Section 2 explores different future uses including light industrial/ workshop, offices, mixed use of community and residential uses, and residential led mixed-use scheme with employment use against the suitability of the Site conditions.
- 6.42 As noted above, the Site is a disused infrastructure facility previously forming part of the Hampton Waterworks operation. Alternative uses of the whole Site for light industrial, office, or community uses, would result in heavy vehicles associated transport movements with traffic impact on Upper Sunbury Road and noise pollution to nearby residential neighbours. Moreover, the site does not have the outdoor space for an external servicing yard or adequate on-site parking provision which is required by these alternative uses. Alteration would be required to the Grade II listed buildings in order to accommodate alternative uses. However, the 2023 Marketing Report by Stirling Shaw noted that that the high investment capital required to carry out these structural alteration works is not justifiable nor viable by a low rental return from these alternative uses.
- 6.43 Meanwhile, the Site is capable of providing an acceptable level of residential accommodation, with a smaller proportion of commercial floorspace, including servicing provision without any adverse impact on neighbouring buildings. It is therefore considered that a residential-led mixed use scheme with employment use presents the best balance of uses and this option was considered commercially viable by the viability assessment.

Viability Assessment

- 6.44 Due to the need to provide a residential led mixed use scheme and the constraints to further extension because of the listed buildings status, it is not feasible to retain the same amount of non-residential floorspace on site. The proposed commercial use will have a GIA area of 318.8 sqm, which is a net loss of 1,806.2 sqm when compared with the existing GIA of 2,125 sqm Sui Generis floorspace.
- 6.45 Due to the condition of the heritage assets on Site, there is a need to ensure the restoration of Grade II listed buildings and to put the buildings into optimum viable use, as supported by NPPF Paragraph 202 and LBRT Local Plan Policy LP 3. A detailed viability assessment dated November 2023 has been carried out to assess whether there is a Conservation Deficit from the difference between the value of the completed restoration of the listed buildings and the costs to put it back into use, which then determine the minimum quantum of facilitating development required to fund that deficit, within the context of the site specific costs and revenues, and the need to ensure that the scheme will be viable and deliverable.
- 6.46 The 2023 viability assessment considered three scenarios:
- 1) Refurbishment of the existing buildings for Class B1 commercial use. This scenario tested whether the existing use is viable or whether there is a conservation deficit that requires cross-subsidy from other optimum uses.
 - This option has a Conservation Deficit of £4 million;
 - 2) Refurbishment of the existing buildings and conversion to form 24 residential dwellings and 272.5sqm of Class B1 commercial space.

- This option has a Conservation Deficit of £1.3 million;
- 3) Refurbishment and extension of the existing buildings to provide 36 residential dwellings and 303 sqm of Class B1 commercial space.
- This option has a small deficit of £193,791, after the provision of 2 affordable units.

6.47 The viability assessment concluded that the proposed development of 36 residential dwellings and 303sqm of commercial floorspace (excluding ancillary communal commercial floorspace) would constitute the optimum viable use and the minimum level of enabling development required to safeguard the future of the Grade II listed buildings on Site.

6.48 The proposed level of 318.8sqm (GIA) employment floorspace including ancillary floorspace is therefore the most the scheme would be able to provide; any increase in commercial accommodation would diminish the viability and deliverability of the scheme due to heritage conversion costs and other site-specific costs.

6.49 With regard to London Plan policies on intensification, during the determination of the 2020 scheme, the Council recognised the practicalities and constraints of the site, in that the creation of additional employment floorspace would likely require multi-storey and/or mezzanine floorspace and/or a higher plot ratio, which would potentially cause harm to the heritage assets. On balance, the Council accepted that the 2020 scheme would have the provision of flexible high-quality employment floorspace that could include a Class E(g)(iii) (industrial process) use which was considered to be acceptable subject to the maximisation of affordable housing provision.

Quality of the proposed commercial floorspace

6.50 Given that a residential-led mixed use redevelopment is the only appropriate and viable scheme for the Site, the scheme seeks to optimise the level of employment floorspace wherever feasible in response to Policy LP 42. It is proposed to provide flexible Class E(g) use at the Ruston & Ward eastern workshop as it would be accessible from the existing pedestrian entrance off Lower Sunbury Road, and acts as a transitional space between the continued Thames Water operation to the southern workshop and the proposed residential conversion.

6.51 The proposal seeks to provide a mixed-use development suitable for the Site's specific constraints, by providing residential units and refurbished commercial floorspace to achieve the optimum use of the heritage assets and provide higher employment density that optimises the development potential of the site.

6.52 The refurbished commercial floorspace will be provided in the Ruston & Ward workshop. The new commercial accommodation has been designed with floor to ceiling heights of 3.58m on the ground floor and 3.76m on the first floor. The commercial space will be flexible and adaptable for a variety of Class E(g) uses, including office, research & development and light-industrial. The employment floorspace will also be suitable for smaller local business including co-working space.

6.53 The proposals will provide 318.8 sqm of refurbished commercial floorspace. Whilst this would result in a reduction of 1,806.2sqm from the existing floorspace, it is considered that this is appropriate given the dilapidated condition of the existing buildings, the configuration of the decommissioned infrastructure facility, and the lack of market demand (as demonstrated by the marketing exercise).

6.54 It is anticipated that the commercial floorspace could accommodate up to 21 to 40 employees, based on 318.8sqm GIA which could be used as offices (8ppl/sqm) or co-working (15ppl/sqm). This is an increase of capacity and employment density when compared with the existing use which has been decommissioned. At the time Thames Water decommissioned the Site in December 2019, there were only 10 to 15 people working on the Site. The proposed commercial floorspace would therefore generate more employment number than the existing use, in a floor area which is 15% of the previous Sui Generis use on site. The intensification of business use and the efficient use of brownfield land is in line with NPPF Paragraph 119 and the London Plan Policy E7.

6.55 The Council also considered that the proposed commercial space in the 2020 scheme would be flexible and adaptable for a variety of Class B1 uses, including offices, research & development, and light-industrial, which would be acceptable and in line with Policy LP40. This revised 2023 application has the same provision of commercial space as the 2020 scheme.

- 6.56 In line with the London Plan Policy E7 and LBRT Local Plan Policy LP 42, the proposed commercial use and the adjacent Thames Water operations have clearly defined boundaries and separation distance from the proposed residential units, and thus their operation would not be compromised by the proposed residential use, particularly given that residential use already exists within the Site at the two Water Works Cottages and along Upper Sunbury Road.
- 6.57 The emerging Local Plan (2023) has been submitted for Examination but yet to be reviewed at Public Examination and therefore carries limited weight in the determination of applications. The emerging Local Plan Policy 24 adopts an approach of no net loss of industrial land within the borough, subject to a satisfactory 2-year marketing evidence. However, it should be noted that the site in its current form and given its specific site constraints, does not meet the needs of the local economy as evidenced by the lack of demand and its long-term vacancy (as demonstrated in the submitted Marketing Reports). The replacement commercial floorspace of 318.8sqm has been designed to be flexible and adaptable for different types of local businesses. The proposed mixed-used scheme with residential use also would not impact on the continued operation of other established employment uses within the site or on neighbouring sites, namely Thames Water Treatment works and Touchlight Biotechnology company.
- 6.58 The Site has been subject to an on-going marketing exercise since January 2018 without any demand for industrial use or alternative commercial or community use. The design team has applied a sequential approach to assess the most suitable and viable use for the Site given the heritage constraints. The proposed residential-led mixed use scheme also seeks to maximise the level of employment floorspace on site and the provision of affordable housing. It is therefore considered that the development is in accordance with London Plan Policies E4 and E7, the Local Plan Policies LP 40 and LP 42 and Emerging Local Plan Policy 24.

Principle of Development – Residential-led Mixed Use Development

- 6.59 Table 4.1 of the London Plan seeks the provision of 4,110 additional homes in Richmond over the period 2019/20-2028/29.
- 6.60 London Plan Policy H1 states that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites especially those within 800m distance of a station; and the redevelopment of surplus utilities and public sector owned sites.
- 6.61 London Plan Policy GG2 details that to create successful sustainable mixed-use places that make the best use of land, those involved in planning and development must enable the development of brownfield land. It also outlines that there must be an understanding of what is valued about existing places and use this as a catalyst for growth, renewal, and place-making, strengthening London's distinct and varied character. London Plan Policy GG4 states that those involved in planning and development must ensure that more homes are delivered.
- 6.62 London Plan Policy E1 highlights that Development proposals related to new or existing offices should take into account the need for a range of suitable workspace including lower cost and affordable workspace.
- 6.63 LBRT Local Plan Policy LP 34 states that the Borough's target is 3,150 homes for the period 2015-2025. This target will be rolled forward until it is replaced by a revised London Plan target. The Council will exceed the minimum strategic dwelling requirement, where this can be achieved in accordance with other Local Plan policies. In addition, the Policy identifies the requirement for 650-700 units up to 2025 in the 'Teddington and the Hamptons' area.
- 6.64 LBRT Emerging Local Plan Policy 10 states that the Borough will seek to exceed the London Plan's minimum strategic dwelling requirement of 4,110 new homes. The indicative net housing completions in the Teddington and Hamptons wards are 900-1,000 units over the 10 year period.

Assessment – Residential-led Mixed Use Development

- 6.65 Both London Plan and LBRT's Local Plan policies clearly identify a need for the delivery of new homes in the borough, with the London Plan which set the strategic target of 4,110 units for LBRT in 2019-2029.

- 6.66 Richmond's latest Annual Monitoring Report (AMR) 2022/23 noted that a net gain of 141 residential units were completed in 2022/23 and at ward level only 19 (net gain) was completed in 2022/23 within the Hampton Ward. This significantly fell short of the London Plan target of 411 net completions per year but the AMR Housing Trajectory, April 2023, sets out that the London Plan target will be met over a 10-year period.
- 6.67 The Site comprises the re-development of the former Hampton Waterworks and is located 400m from Hampton Rail Station. The principle of redevelopment of brownfield sites, especially those such as Hampton Waterworks, which are situated within 800m distance of a station, is supported by London Plan Policies H1 and GG2.
- 6.68 The proposed redevelopment of this brownfield site has been designed with a strong understanding of the merits of the existing Site and uses this as a catalyst for its regeneration and reutilisation as a residential led mixed-use development. The scheme has been developed to bring the vacant buildings back into a viable use, securing their future use, whilst also providing a sensitive heritage renovation and refurbishment of the buildings on the Site.
- 6.69 The proposed development would result in a net gain of 34 residential units, making a positive contribution to LBRT's housing stock in line with Policy LP 34 of the Local Plan.
- 6.70 The proposed residential use has clearly defined separation from the proposed commercial use and the adjacent Thames Water operation. Moreover, residential use already exists within the Site at the two Water Works Cottages. The proposed residential units within the mixed-use scheme would not adversely impact on the continued operation of Thames Water or the proposed commercial use. It is therefore considered that the proposed residential-led mixed use scheme complies with LBRT Local Plan Policy LP 40.
- 6.71 It is therefore considered that residential use is appropriate in this location, is in accordance with London Plan Policies H1, GG2 and GG4; and LBRT Policies LP34 and LP 40.

Affordable Housing

- 6.72 London Plan Policy H4 requires major developments (10 or more units) to provide affordable housing on site unless there are exceptional circumstances.
- 6.73 London Plan Policy H5 states the threshold approach for affordable housing is initially set to a minimum of 35%, which increases to 50% for Non-Designated Industrial Sites appropriate for residential uses where the scheme would result in a net loss of industrial capacity. Where an application does not meet this threshold approach requirement, viability evidence must be submitted.
- 6.74 London Plan Policy H6 requires that a minimum of 30 percent of affordable residential units be designated as low-cost rented homes, as either London Affordable Rent or Social Rent, allocated according to need and for Londoners on low incomes. A minimum of 30 percent intermediate products should meet the definition of genuinely affordable housing, including London Living Rent and London Shared ownership. The remaining 40 percent is to be determined by LBRT as low-cost rented homes or intermediate products.
- 6.75 LBRT's Local Plan Policy LP 36 states that the Council expects at least 50% affordable housing on all former employment sites (designated and non-designated sites), which would comprise a tenure mix of 40% affordable housing rent, and 10% affordable intermediate housing.
- 6.76 Local Plan Policy LP 36 notes that the Council will have regard to the following points when negotiating the maximum amount of affordable housing:
- Economic viability;
 - Individual site costs;
 - The availability of public subsidy; and,
 - Overall mix of uses and other planning benefits.

- 6.77 Local Plan Policy LP 36 also notes that, where a reduction to an affordable housing contribution is sought from policy on economic viability grounds, developers should provide a development appraisal to demonstrate that schemes are maximising affordable housing.
- 6.78 Paragraph 2.4.2 of LBRT Affordable Housing SPD (2014) outlines that where the Council agrees to the loss of employment floorspace as part of residential redevelopment, the Council will seek to obtain the greatest reasonable amount of affordable housing from redevelopment on the site, subject to a formal appraisal of financial viability.

Assessment – Affordable Housing

- 6.79 LBRT Local Plan Policy LP 36 expects at least 50% affordable housing on all former employment sites with a tenure mix of 40% affordable rent and 10% affordable intermediate housing. Policy LP 36 notes that the Council will have regard to viability, site costs, public subsidy, the overall mix of use and other planning benefits, when negotiating the maximum amount of affordable housing.
- 6.80 As noted above, due to the condition of the heritage assets on site, there is a need to ensure the restoration of the listed buildings and to put the buildings into optimum viable use. A detailed financial appraisal has been carried out which determined that the development proposals, comprising 36 residential units and commercial space, is the minimum level of enabling development required to secure the future of the heritage assets on Site.
- 6.81 A viability assessment August 2022 was prepared by ULL and submitted for pre-application discussions with the Council in 2022/23. The report was reviewed by the Council's external assessor Bespoke in November 2022. The Bespoke review concluded that the alternative use of converting the whole site to either Class B1 commercial uses only or residential use only, would both have resulted in negative residual value. Bespoke agreed that the proposed mixed-use scheme of 36 dwellings and 303sqm commercial use would have a positive residual land value and is viable to provide s106 affordable housing contribution.
- 6.82 Following receipt of the Bespoke report, the application is proposing the delivery of 2 affordable rented units as part of the scheme, in the 2 x 3 bedroom cottages. An initial meeting was held with Richmond Housing Partnership regarding the provision.
- 6.83 The November 2023 viability assessment submitted concludes that there is only a marginal viability surplus for the proposed scheme. The viability assessment concluded that the proposed development of 36 residential dwellings and 303sqm of commercial floorspace (excluding communal commercial floorspace) would constitute the optimum viable use and the minimum level of enabling development required to safeguard the future of the Grade II listed buildings on Site. This option has a small deficit of £193,791, after the provision of 2 affordable units.
- 6.84 The proposals would therefore provide the Optimum Viable Use for the Grade II listed buildings on site and to secure the revitalisation of these currently derelict buildings. The proposal would also create new residential units to meet to the much-needed housing demand, including the provision of 2 affordable units as part of the scheme.
- 6.85 It is considered that the proposals have been fully assessed and are compliant with London Plan Policies H4 and H5 and LBRT Policy LP 36.

Design and Layout

- 6.86 London Plan Policy D3 details that all development must make the best use of land by following a design-led approach to density that optimises the capacity of sites. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to the site's context and capacity for growth and existing and planned supporting infrastructure. 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; and

- respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character.

- 6.87 LBRT Local Plan Policy LP1 requires all development to be of high architectural and urban design quality, and proposals will have to demonstrate a thorough understanding of the site and how it relates to its existing context, including character and appearance, and take opportunities to improve the quality and character of buildings, spaces and the local area.
- 6.88 LBRT Local Plan Policy LP 3 emphasises that development proposals should conserve and make a positive contribution to the borough's designated heritage assets. This would include preserving and contributing positively towards the borough's listed buildings, their settings, and designated Conservation Areas. Policy LP 4 requires development to preserve, and where possible enhance, the significance, character and setting of the non-designated heritage assets, including Buildings of Townscape Merit.
- 6.89 LBRT Emerging Local Plan Policy 44 states development should optimise site capacity through the design-led approach. Emerging Local Plan Policy 28 requires all development to be of high architectural and urban design quality.

Assessment – Design and Layout

- 6.90 The scheme design has been further refined since the refused scheme in 2020 (ref: 20/1744/FUL; 20/1742/LBC), to reduce the impact on the heritage value of the listed buildings, involving extensive consultation with Richmond Council and Historic England.
- 6.91 The proposed scheme is for extensive refurbishment with sensitively designed extensions and subdivision within the existing volume of the listed buildings. The existing roof structures of the engine houses are to be retained and contemporary roof extensions are proposed for both buildings' 'low level' boiler house sections. A two-storey sympathetic extension is proposed to the south of the Karlake Building at the location of its demolished former wing, along with a single storey extension to the Storehouse to create a 3-bed residential unit. The two cottages will be retained and renovated for residential use.
- 6.92 The proposal has been informed by and aims to enhance the historic character of the Site, whilst optimising its development potential. The development parameters have, in part, been informed by the Viability Assessment which sets out the minimum level of enabling development, in order to secure the future of the historic assets. The proposals therefore provide an optimum viable use to secure the revitalisation of these currently derelict buildings, whilst maintaining a sympathetic design.
- 6.93 The Hampton Village Planning Guidance (2017) identifies development which harms and diminishes the industrial character of Hampton Waterworks buildings as a threat. The proposals aim to restore the existing building fabric, whilst providing sympathetic contemporary extensions to provide high quality floorspace necessary to achieve the best viable future use for the Site and a sensitive listed building conversion. The proposals seek to strip out the poor quality twentieth century internal works, restore the listed buildings and add sensitive additions for modern use.
- 6.94 As part of the pre-application process and set out within Section 2 of the Design & Access Statement, the design team has assessed different options to sensitively create additional floorspace, including a new building in place of the cottages, wholesale roof extensions on Karlake and Ruston & Ward Buildings, or raising the existing roof & truss. The proposals with roof extensions on the single storey boiler house sections and rear extension to the Karlake Building and Storehouse, are modest in proportion in comparison to other options considered, and are required to accommodate the least amount of development required to achieve a viable and deliverable scheme.
- 6.95 Most of the existing roofs across the site are to be structurally retained, with thermal update and reroofing to match existing. New roof extensions are proposed for the central single storey blocks only, as that location allows for the greatest addition of floor area to the development, thus creating a viable scheme.
- 6.96 The design of the roof extensions has been developed through the extensive pre-application process to reduce their impact on the heritage value of the buildings. The proposed roof extensions to the

two boiler houses will be set back from the building frontage to minimise its visual impact from the street level, with the top of the proposed pitched roof set at the highest point of the existing roof pitch. This will retain the listed buildings at the foreground and maximise visibility of existing heritage features.

- 6.97 When compared with the refused 2020 scheme, the following design refinement has been made to the scheme following recommendation received from Richmond's conservation officer, Design Review Panel (DRP), and Historic England:
- Reduction of residential units from 37 units to 36 units, to address the DRP comments to create fewer and larger units.
 - Refinement of the roof extension design at the low-level boiler houses, with a lower pitched roof and less glazing panels.
 - The new roof extensions are within the existing roof ridge height and the material selection of timber and grey metal create a lighter colour palette that blends with the buff bricks and light stone of the existing buildings.
 - The Karlake roof extension has been cut back to reveal more of the arched windows of Karlake Pumphouse East, to expose to a similar level as the existing roof line.
 - Rear extension of the Karlake Building now has matching brick and recessed aisles to match the host building.
 - Placement of historic machinery to the grounds of the Site to raise the public appreciation of the Site's architectural and historic interest.
 - Storehouse rear extension area reduced by 18%.
 - Relocation of the children play area to the rear of Karlake Pumphouse West
 - Enhanced landscaping proposal including additional trees along the southern boundary and the introduction of green roof on the Storehouse rear extension and the ASHP plant enclosure.
- 6.98 A detailed assessment of the material palette, roof extension design options and fenestration of the rear and roof extensions are set out in the Design & Access Statement Section 5.
- 6.99 In order to optimise the amount of usable area within the existing volume of the listed buildings, it is proposed to install mezzanine floors to provide new office and residential floorspace. There will be double height spaces immediately behind the full height windows, to allow the windows to remain uninterrupted by floor sections.
- 6.100 The rear extension to the Karlake Building, situated in the location of an historic extension, is deferential to the existing building, and provides additional floorspace through a design sympathetic to the building's industrial heritage.
- 6.101 Where necessary for the new use, modern interventions are required on the existing façade, such as the creation of new doors and windows. These are carefully inserted to minimise the loss of heritage fabric.
- 6.102 As a result of pre-application discussions and comments received from DRP, the single-storey rear extension to the Storehouse has been reduced by 18% so that the extension reminds subservient to the host building.
- 6.103 Overall, the proposal is of a high-quality design that will optimise the development of the Site, maximise the provision of new employment space and homes, whilst respecting local townscape and heritage.

Heritage

- 6.104 NPPF Paragraph 200 details that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting.

- 6.105 NPPF Paragraph 203 states that in determining applications, local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.
- 6.106 NPPF Paragraph 208 outlines that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- 6.107 London Plan Policy HC1 states that Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.
- 6.108 Supporting text of London Plan paragraph 7.1.6 details that urban renewal in London offers opportunities for the creative re-use of heritage assets and the historic environment, such as by retaining and reusing buildings, spaces and features that play an important role in the local character of an area.
- 6.109 LBRT Local Plan Policy LP 3 states that the Council will require development to conserve and, where possible, take opportunities to make a positive contribution to, the historic environment of the borough. Development proposals likely to adversely affect the significance of heritage assets will be assessed against the requirement to seek to avoid harm and the justification for the proposal. The significance (including the settings) of the borough's designated heritage assets will be conserved and enhanced by the following means:
- Give great weight to the conservation of the heritage asset when considering the impact of a proposed development on the significance of the asset.
 - Resist the demolition in whole, or in part, of listed building.
 - Resist the change of use of listed buildings where their significance would be harmed, particularly where the current use contributes to the character of the surrounding area and to its sense of place.
 - Require the retention and preservation of the original structure, layout, architectural features, materials as well as later features of interest within listed buildings, and resist the removal or modification of features that are both internally and externally of architectural importance or that contribute to the significance of the asset.
 - Demolitions (in whole or in part), alterations, extensions and any other modifications to listed buildings should be based on an accurate understanding of the significance of the heritage asset.
 - Require, where appropriate, the reinstatement of internal and external features of special architectural or historic significance within listed buildings, and the removal of internal and external features that harm the significance of the asset, commensurate with the extent of proposed development.
 - Require the use of appropriate materials and techniques and strongly encourage any works or repairs to a designated heritage asset to be carried out in a correct, scholarly manner by appropriate specialists.
- 6.110 LBRT Local Plan Policy LP3 states that all proposals in Conservation Areas are required to preserve and, where possible, enhance the character or the appearance of the Conservation Area. The Council resists substantial demolition in Conservation Areas and any changes that could harm heritage assets, unless it can be demonstrated that:
- in the case of substantial harm or loss to the significance of the heritage asset, it is necessary to achieve substantial public benefits that outweigh that harm or loss;
 - in the case of less than substantial harm to the significance of the heritage asset, that the public benefits, including securing the optimum viable use, outweigh that harm; or

- the building or part of the building or structure makes no positive contribution to the character or distinctiveness of the area.

- 6.111 LBRT Local Plan Policy LP4 states that the Council will seek to preserve, and where possible enhance, the significance, character and setting of non-designated heritage assets, including Buildings of Townscape Merit. There will be a presumption against the demolition of Buildings of Townscape Merit.
- 6.112 LBRT Emerging Local Plan Policy 29 requires development to conserve and, where possible, take opportunities to make a positive contribution to, the historic environment of the borough. Development proposals likely to adversely affect the significance of heritage assets will be assessed against the requirement to seek to avoid harm and the justification for the proposal. The Council resists the change of use of listed buildings where their significance would be harmed, particularly where the current use contributes to the character of the surrounding area and to its sense of place, unless it secures the optimum viable use and/or there are public benefits to outweigh the harm.

Assessment – Heritage

- 6.113 Richmond's Policies Map (2015) identifies the Site as being within the Hampton Village Conservation Area and the Ruston Building is marked as a Vista/Landmark location. There are three Grade II listed buildings on site, i.e.: Ruston & Ward Building; Karslake Buildings; and the cast iron railing around the corner of Lower Sunbury Road and Upper Sunbury Road. In addition, 3 & 4 Water Works Cottages and the Storehouse are Buildings of Townscape Merit.
- 6.114 A Heritage Statement has been prepared to assess the significance of these heritage assets, and the impact of the development on these assets.
- 6.115 As noted above, the buildings on site are dilapidated with part of the Site not being used for nearly three decades. The existing buildings on site were built as a water treatment infrastructure and are unsuitable for modern business requirements. The marketing exercise since 2018 was unable to find interested parties to occupy the Site in its existing condition. If no suitable alternative use is found, the existing buildings will be left vacant where parts of the buildings are already suffering from water damage, the heritage buildings would fall into either more disrepair and very likely jeopardise their future survival.
- 6.116 Given the need to bring the listed buildings back to a viable use and the significant site-specific cost, a viability assessment has been carried out which assessed that the proposed mixed use development with roof extensions and rear extensions comprises the minimum amount of enabling development in order to secure the future of the heritage assets on site. On that basis, the heritage assessment considered that there is a significant heritage benefit to securing the optimum viable use through the proposed mixed-use scheme.
- 6.117 The design team sought pre-application advice from the LBRT and Historic England in April 2018 and March 2020, June 2022, and June 2023. The scheme has evolved from the 2018 pre-application scheme which included the demolition of the Water Works Cottages and part of the Storehouse, and roof extensions to all parts of the Ruston and Karslake Buildings apart from the southern block of the Ruston Building. The 2020 refused scheme involved the retention of the two cottages and the Storehouse with rear extensions, roof extensions to both boiler houses at Karslake and Ruston & Ward, and 2 storey rear extension to the Karslake Building. The latest proposal in 2023 seeks further refinement to the roof extension design and the materiality of the two-storey rear extension to the Karslake Building, and substantial public benefit by the provision of affordable housing and public engagement measurements to highlight the historic use of the buildings.
- 6.118 The latest design was presented to Historic England in June 2023. Their written advice dated 26 June 2023 (Appendix 2) noted that the design team had done much to address their previous concerns and that they would not raise any objections to the current proposals.
- 6.119 The Heritage Statement states that the revised scheme design on the roof extensions at Karslake and Ruston Building has reduced the impact of previous proposals by lowering the overall height of the new roofs and keeping in line with the existing ridge line. Revised material choices will further lessen the overall visual impact by keeping more in harmony with the existing building aesthetics. The reduction of massing will also reduce the obstruction of the arched window in the neighbouring

engine house compared to the previously refused proposals. The proposed two storey extension at Karslake has also been reduced in size and scale with a revised material palette which better reflects the existing building while remains clearly distinguishable.

- 6.120 The development proposals have been designed to preserve and enhance the notable architectural and historic features of the two listed Victorian pump houses, wherever feasible and appropriate. As detailed within Section 3 and Heritage Statement, the design has been developed and refined since 2020 to protect the Site's heritage value. The revised scheme represents a fundamentally **heritage-led scheme** that establishes a viable long-term use for the listed buildings on site, securing their future and offers significant opportunities for public engagement with the history of the Site.
- 6.121 The latest scheme also includes detailed records of the existing historical fabric on site (photographs, surveys, detailed plans of windows and doors), and the retention of the existing historical fabric as part of the scheme by integration of the existing pumphouse machinery as part of the scheme, such as the retention of the existing roof trusses and lifting beam crane in situ which will be exposed to the new commercial units and residential flats, retention and relocation of some of the pumphouse machinery in front of the Ruston & Ward where they would be appreciated by the public, and retention and relocation of existing cobbles within the hard landscaping.
- 6.122 A summary of the Public Benefits of the scheme and Interventions are enclosed in **Appendix 3**, as an extract from the Benefits Interventions document prepared by LOM architect.
- 6.123 It is proposed that the following heritage-led delivery will be developed further at the implementation stage, to be secured by planning conditions:
- Heritage advice informed Methodology Statements for key work stages, including:
 - Demolition / removal of modern fabric
 - Removal, storage, and re-installation of the historic machinery components to be retained on site;
 - Refurbishment, and replacement of key heritage fabric;
 - Provision of a Heritage Informed Management Plan; and
 - Provision of a detailed public engagement strategy, comprising installation of heritage interpretation measures and information boards.
- 6.124 The development proposals have been designed to preserve and raise public appreciation of the architectural and historic features of the two listed Victorian pump houses. As confirmed by the U.L.L Property viability study, the development proposals provide the optimum viable use to the currently derelict buildings as they include the minimum level of enabling development to secure the future of the Grade II listed buildings and the associated Buildings of Townscape Merit. This is considered a significant heritage benefit. However, the removal of the original composite wrought-iron truss roofs of the two boiler houses coupled with the addition of single-storey extensions are considered to cause harm to the significance of the listed pump houses. On balance, however, it is considered that the development proposals cause no more than a low - moderate level of less-than-substantial harm upon their significance. In accordance with Paragraph 202 of the NPPF, this should to be weighed against the evidence that the development proposals will secure their long-term future through a sustainable optimum viable use and raise public appreciation of them.

Views

- 6.125 LBRT Local Plan Policy LP 5 states that the Council will protect the quality of the views, vistas, gaps, and the skyline, all of which contribute significantly to the character, distinctiveness, and quality of the local and wider area, by the following means.
- protect the quality of the views and vistas as identified on the Policies Map, and demonstrate such through computer-generated imagery (CGI) and visual impact assessments;
 - resist development which interrupts, disrupts, or detracts from strategic and local vistas, views, gaps, and the skyline;

- require developments whose visual impacts extend beyond that of the immediate street to demonstrate how views are protected or enhanced;
 - require development to respect the setting of a landmark, taking care not to create intrusive elements in its foreground, middle ground, or background; and
 - seek improvements to views, vistas, gaps, and the skyline, particularly where views or vistas have been obscured.
- 6.126 LBRT Emerging Local Plan Policy 31 seeks to protect the quality of the identified views, vistas, gaps, and the skyline.

Assessment – Views

- 6.127 The Ruston Building is marked as a Vista/Landmark location on Richmond's Policies Map. The development proposals have been designed with an aim to protect and enhance this designated vista and views of the Site.
- 6.128 As shown within the CGIs and visual impact assessment, enclosed within the Design and Access Statement Section 5, the existing deteriorating buildings will be restored, improving immediate views of the Site and those from the surrounding area.
- 6.129 The proposed roof extensions to the two boiler houses will be set back from the building frontage and they have been further reduced in height to be kept within the existing roof ridge, to minimise the roof extensions impact on the façade appearance. The deep shadow created by the overhanging eaves also help to set the roof extension behind the parapet. The proposed materiality of timber and grey metal with limited glazing also creates a lighter colour palette that blends with the existing building façade. These features minimise the visual impact of the extensions from the street level and ensure the heritage buildings remain prominent.
- 6.130 Furthermore, the proposed extensions to the buildings on Site are modest. The proposed development therefore maintains a very similar form and scale to the existing, and the contemporary additions provide a high-quality sympathetic design response. The proposed additions are therefore not overly visible within the CGI's, and do not have a detrimental impact on views of the Site.
- 6.131 In addition, the two-storey extension to Karslake and the single storey extension to the Storehouse are to the rear of the buildings, and therefore not visible within the street scene.
- 6.132 Moreover, high quality landscaping and new tree plantings are proposed to the east of the Ruston & Ward Building and north and south of the Karslake Building to enhance the buildings' setting.
- 6.133 The proposal has therefore sensitively designed to ensure it respects and enhances this Vista/landmark location on Upper Sunbury Road in line with LBRT Policy LP5.

Quality of Residential Accommodation

- 6.134 London Plan Policy D6 also outlines that housing development should maximise the provision of dual aspect dwellings, and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirement of Part B in Policy D3 (Optimising site capacity through the design-led approach) and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy and avoid overheating.
- 6.135 LBRT Local Plan Policy LP 35 states that all new housing development, including conversions, are required to comply with the Nationally Described Space Standards.
- 6.136 However, Paragraph 9.2.10 of the supporting text notes that where developments are not able to meet policy requirements for housing mix and standards, the applicant should identify the shortcomings and demonstrate reasons why, including that suitable alternative layouts or provision such as alternative amenity space in the form of roof terraces, roof gardens and balconies have been considered and incorporated wherever possible.
- 6.137 The Council's Residential Development Standards SPD (2010) encourages a minimum of 5 sqm of private outdoor space for 1-2 person dwellings plus an extra 1 sqm for each additional occupant.

- 6.138 LBRT Emerging Local Plan Policy 13 states that development including conversions, are required to comply with the Nationally Described Space Standard. New homes significantly above the minimum standards that do not make efficient use of land will be resisted.

Assessment – Quality of Residential Accommodation

- 6.139 The number of residential units has been reduced from 37 units to 36 units in the revised scheme, following advice received from the DRP that fewer and larger units would have less strain on the conversion of the heritage buildings in terms of splitting of spaces and provision of services.
- 6.140 The proposed dwellings are of a high design standard with the majority of units providing generous internal floorspace higher than the minimum space standards set out in the London Plan or the Local Plan.
- 6.141 There is only one unit which falls slightly under the minimum space requirements. This is Unit 17 on the Karslake Building Level 2 roof extension which is a 2-bed 4 person dwelling with a floorspace of 68.2sqm (GIA) which is 1.8 sqm below the 70 sqm minimum space standards. However, this unit within the roof extension has a generous roof terrace of over 20 sqm, well above the minimum private amenity space requirement of 7 sqm. The occupants would also have access to communal outdoor amenity space and the communal shared facilities within the basement of Karslake Building which could be used as a cinema room or a gym. It is therefore considered that Unit 17 would provide high quality residential accommodation in line with policy requirements.
- 6.142 Due to the constraints of the existing heritage buildings, not all dwellings are **dual aspect**, but where possible dual aspect dwellings (19 units) have been provided. There are 17 single aspect dwellings, of which 10 units are single aspect north facing units. There were 22 single aspect dwellings in the 2020 refused scheme.
- 6.143 However, it should be noted that these single aspect north facing units comprise of conversion gallery ground level units with double height space and large heritage windows which allow a generous amount of natural light; whilst the single aspect north facing units on the roof extensions have access to generous roof terraces and floor to ceiling sliding doors, to ensure a good level of daylight & sunlight and ventilation.
- 6.144 It is therefore considered that considering the constraints of the heritage buildings, high quality accommodation will be provided, which is compliant with London Plan Policy D6 and LBRT Local Plan Policy LP35.

Unit Mix

- 6.145 London Plan Policy H10 states that schemes should generally consist of a range of unit sizes. To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, applicants and decision-makers should have regard to:
- 1) robust local evidence of need where available, or, where this is not available, the range of housing need and demand identified by the 2017 London Strategic Housing Market Assessment;
 - 2) the requirement to deliver mixed and inclusive neighbourhoods;
 - 3) the need to deliver a range of unit types at different price points across London;
 - 4) the mix of uses in the scheme;
 - 5) the range of tenures in the scheme;
 - 6) the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity;
 - 7) the aim to optimise housing potential on sites;
 - 8) the ability of new development to reduce pressure on conversion, sub-division and amalgamation of existing stock; and

9) the role of one and two bed units in freeing up family housing.

- 6.146 LBRT Local Plan Policy LP 35 states that development should generally provide family sized accommodation, except within the five main centres (Richmond, Twickenham, Teddington, East Sheen, and Whitton) and Areas of Mixed Use where a higher proportion of small units would be appropriate. The housing mix should be appropriate to the site-specifics of the location, the existing stock in the locality and the character of the area. The supporting text of Policy LP35 notes that there are an increasing proportion of one person households and on appropriate sites an elevation of small units (1 bedroom or studios) will be required, and to accommodate options for downsizing.
- 6.147 LBRT Emerging Local Plan Policy 13 states that development should generally provide a mix of sizes and types of accommodation. Area within PTALs 3-6 or within 800m distance of a station or town centre boundary should provide a higher proportion of small units (studios and 1 beds). For market housing, there is highest demand for 2 and 3 beds. The affordable housing mix should be based on discussion with a Registered Provider(s). The housing mix should be appropriate to the site specifics of the location.

Assessment – Unit Mix

6.148 The proposal will provide a varied mix of unit sizes, with a mixture of one, two and three-bed units as follow:

Unit Type	Unit No.	Unit %
1 bed 1 person	0	44%
1 bed 2 person	16	
2 bed 3 person	4	31%
2 bed 4 person	7	
3 bed 4 person	0	19%
3 bed 5 person	5	
3 bed 6 person	2	
4 bed 8 person	2	6%
Total	36	100%

- 6.149 Compliant with policy, the proportion of one and two units is considered appropriate for the site, given its location within 400m of Hampton Rail Station and Hampton Village (6 minutes’ walk). The local area is also dominated by houses suitable for families and the proposed apartments would be an appropriate mix to the local area, to provide options for downsizing and smaller households.
- 6.150 The scheme will also provide units suitable for family sized accommodation, including seven three-bed units and two 4-bed units, a total of (255) to be 3-bed. In addition, seven 2-bed 4 person units would also be suitable for family accommodation.
- 6.151 The proposal is considered to provide an appropriate mix of units, in accordance with the requirements of London Plan Policy H10 and LBRT Policy LP 35.

Amenity and Play Space

- 6.152 London Plan Policy S4 details that development proposals for schemes that are likely to be used by children and young people should:
- increase opportunities for play and informal recreation and enable children and young people to be independently mobile; and
 - for residential developments, incorporate good-quality, accessible play provision for all ages. At least 10 square metres of play space should be provided per child.
- 6.153 LBRT Local Plan Policy LP 35 notes that housing development should provide adequate external space. Purpose built, well designed, and positioned balconies or terraces are encouraged where new residential units are on upper floors, if they comply with Policy LP8 Amenity and Living Conditions. Amenity space for all new dwellings, including conversions, should be:
- private, usable, functional, and safe;

- easily accessible from living areas;
 - orientated to take account of need for sunlight and shading;
 - of a sufficient size to meet the needs of the likely number of occupiers; and
 - accommodation likely to be occupied by families with young children should have direct and easy access to adequate private amenity space.
- 6.154 Paragraph 9.2.10 of the supporting text to LBRT Local Plan Policy LP 35 details that where developments are not able to meet policy requirements for housing mix and standards, the applicant should identify the shortcomings and provide a justification.
- 6.155 LBRT Local Plan Policy LP 31 requires all major development proposals in the borough to provide an analysis of existing open space provision in line with the Council's accessibility standards for travel to open spaces.
- 6.156 LBRT Local Plan Policy LP 31 also requires all major development proposals in the borough provide a play and child occupancy assessment to determine whether the proposal will lead to an estimated child occupancy of ten children or more. Where the assessment demonstrates an estimated child occupancy of ten children or more, the development proposal should make appropriate and adequate provision of dedicated on-site play space by following the London Plan benchmark standard of 10 sq. m per child. Paragraph 8.4.14 of the supporting text states that where the assessment of existing play facilities within the surrounding area demonstrates sufficient and high-quality provision, on-site provision of play facilities may not be necessary, but this will be assessed on a case-by-case basis.
- 6.157 Richmond's Residential Standards SPD (2010) notes that the Council will encourage a minimum of 5 sqm of private outdoor space for 1-2 person dwellings plus an extra 1 sqm should be provided for each additional occupant.
- 6.158 LBRT Emerging Local Plan Policy 13 states all new housing development, including conversions, should provide adequate external space. Well-designed balconies or terraces are encouraged where new residential units are on upper floors. Accommodation likely to be occupied by families with young children should have direct and easy access to adequate private amenity space.

Assessment – Amenity and Play Space

- 6.159 The proposal will provide high quality, green outdoor spaces, within the grounds of the retained heritage assets. Due to the constraints of the existing heritage buildings, private amenity space has not been achievable for every unit. 21 dwellings out of the 36 units are provided with private outdoor amenity space.
- 6.160 All residents will however benefit from communal outdoor gardens (441.6 sqm) and a shared roof terrace (25.1sqm) on Karlake Building. Future residents will therefore benefit from high quality, easily accessible amenity space, which will be visually attractive with landscaping.
- 6.161 Following the DRP's recommendation, the children's play area (85.7sqm) is now situated south of Karlake Building away from Upper Sunbury Road. The play equipment within the play area have been designed to allow for periodic vehicle movements as when required by Thames Water for operational need.
- 6.162 Furthermore, the proposed balconies and roof terraces are well positioned with substantial separation distance with existing residential properties on the boundary of the Site. It is therefore considered that they would not result in the loss of privacy or overlooking.
- 6.163 The submitted Open Space Assessment identifies that the Site is readily accessible to several existing open space including Hampton Village Green and the Thames riverside.
- 6.164 Based on the GLA child yield figures, the estimated child occupancy for the proposed development will generate a total of 16.5 children, with a breakdown by age as follow:

**Yield from Development
(persons)**

	Market & Intermediate	Social	Total
Ages 0, 1, 2, 3 & 4	6.8	1.1	7.9
Ages 5, 6, 7, 8, 9, 10 & 11	4.7	1.0	5.6
Ages 12, 13, 14 & 15	1.3	0.6	2.0
Ages 16 & 17	0.7	0.3	1.0
18-64	58.1	4.4	62.5
65+	1.4	0.1	1.5
Total Yield	73.0	7.5	80.5

Play Space Calculator

Total Children	16.5
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- 6.165 In accordance with LBRT’s Planning Obligations SPD Child Yield Formula, the proposed development requires the following amount of play space for the different age groups:
 - 79 sqm for under 5 years old within 100m;
 - 56 sqm for 5-11 years old within 400m; and
 - 30 m for 12+ years old within 800m.
- 6.166 The site will also provide 85.7 sqm of play space on Site for under 5’s meeting policy requirements.
- 6.167 Notwithstanding the on-site play space provision, Hampton Library which is located immediately to the north of the Site, is set in a large open space suitable for informal play for children under 12 years old. As stated within the Play Space Assessment, the Site is readily accessible to a number of existing play spaces for 5-11 and 12+ years old children, including Hampton Village Green, Beveree Wildlife Site and Carlisle Park.
- 6.168 It is considered that the development will provide adequate doorstep play area for under 5 years old within the scheme, with access to existing play spaces within a reasonable walking distance for children ages 5-11 and 12+.
- 6.169 Mindful of the Site constraints it is therefore considered that the proposals provide high-quality amenity space compliant with London Plan Policies 3.6 and 7.6, Draft London Plan Policy S4, and LBRT Local Plan Policies LP31 and LP35.

Residential Amenity

- 6.170 LBRT Local Plan Policy LP 8 states that all development will be required to protect the amenity and living conditions for occupants of existing, adjoining and neighbouring properties. The Council will:
 - ensure balconies do not raise unacceptable overlooking or noise or disturbance to nearby occupiers;
 - ensure that proposals are not visually intrusive or have an overbearing impact as a result of their height, massing or siting, including through creating a sense of enclosure; and
 - ensure there is no harm to the reasonable enjoyment of the use of buildings, gardens and other spaces due to increases in traffic, servicing, parking, noise, light, disturbance, air pollution, odours or vibration or local micro-climatic effects.
- 6.171 LBRT Local Plan Policy LP 10 seeks to ensure that artificial lighting in new developments does not lead to unacceptable impacts.
- 6.172 LBRT Local Plan Policy LP 40 states that the inclusion of residential use within mixed use schemes will not be appropriate where it would adversely impact on the continued operation of other established employment uses within that site or on neighbouring sites.

- 6.173 LBRT Emerging Local Plan Policy 46 requires all development to provide the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties .

Assessment – Residential Amenity

- 6.174 Residential use already exists on site in the form of the two Water Works cottages, and a number of houses on Upper Sunbury Road are located to the north and west of the Site.
- 6.175 The proposed offices located within the southern block of Ruston Building would act as a transitional area between the residential use and Thames Water’s operation. In addition, gated access for Thames Water is proposed at the southern and western boundary of the Site to facilitate their operations. The proposed mixed-use development therefore would not impact on the continued operation of the wider Hampton Waterworks.
- 6.176 Hampton Waterworks supply fresh water to London, and it is not a sewage treatment centre. The freshwater filter beds located to the south of the Site would not result in odour nuisance to the proposed residential use.
- 6.177 Reservoir boundary security will be maintained and improved as part of the development. Any defects to the boundary fence to the south of the Site will be remedied as part of the scheme. It is also proposed to have new trees and shrub planting along the southern boundary adjacent to the reservoir. The proposed residential units will increase passive surveillance of this boundary and improve security.
- 6.178 The proposed extensions, including balconies and roof terraces, are well positioned with substantial separation distance with existing residential properties on the boundary of the Site. It is therefore considered that they would not result in the loss of privacy or overlooking.
- 6.179 Some of the windows to the Karslake Building’s west pumphouse overlook the adjacent 5 Water Works cottages. As detailed within the Design and Access Statement, an assessment of sight lines has been conducted. As a result of the study, window panels within eye level inside Karslake Buildings on this elevation will be glazed with etched, opaque glass to prevent a view out up to eye level.
- 6.180 An External Lighting Assessment, prepared by Hydrock, also demonstrates that design measures have been considered to reduce light spill, and reduce any potential impact on the neighbouring environment.
- 6.181 It is therefore considered that the proposed residential use would be compatible with the proposed office uses within the site, and the existing waterworks operation. Furthermore, the proposal would protect the amenity of neighbouring occupiers. The proposals are therefore compliant with London Plan Policy 7.6 and LBRT Local Plan Policies LP 8, LP 10, and LP 40.

Inclusive Accessibility

- 6.182 LBRT Local Plan Policy LP 30 encourages an inclusive development layout that considers the needs of all, including the older population and disabled people.
- 6.183 London Plan Policy D7 and LBRT Local Plan Policy LP 35 outlines that 90% of all new build housing is required to meet Building Regulation Requirement M4(2) ‘accessible and adaptable dwellings’ and 10% of all new build housing is required to meet Building Regulation Requirement M4(3) ‘wheelchair user dwellings’.
- 6.184 Paragraph 9.2.10 of the LBRT Local Plan details that where developments are not able to meet policy requirements for housing mix and standards, the applicant should identify the shortcomings and demonstrate reasons why.
- 6.185 LBRT Emerging Local Plan Policy 13 states at least 10% of all new build housing is required to meet Building Regulation Requirement M4(3) and all other new build housing is required to meet Part M4(2).

Assessment – Inclusive Accessibility

- 6.186 Due to the constraints of the existing heritage buildings, the Site has been designed to include features which promote accessibility wherever feasible and appropriate to the historic fabric. The proposals will have four units which meet Part M4(3) 'wheelchair user dwellings' and 24 dwelling units will meet Part M4(2) 'accessible and adaptable dwellings'; 8 dwellings will be classified as Part M4(1).
- 6.187 The proposal would therefore provide 10% (4 units) which meet Part M4(3) but only 67% (24 Units) will meet Part M4(2) requirement. 22% (8 units) meet Part M4(1) requirement; this is due to the constraints of the existing heritage building which do not allow for a fully compliant Part M4(2) but these units will include as many Part M4(2) requirements as possible. The existing constraints are mainly to do with the need to install insulation above the existing slab, thus a level access is not possible for the ground floor units with their own front doors.
- 6.188 The common lobbies will have level access enabling wheelchair access to the lifts, and in turn all building levels. The Site has a minimal slope throughout and the landscape paths have been designed with curb cuts, where required, to allow for ease of movement and wheelchair accessibility.
- 6.189 In addition, the employment space includes features to promote accessibility. A level entrance will be provided through the Ruston & Ward Building's lobby. Furthermore, an accessible WC is provided within the lobby.
- 6.190 Mindful of the Site's heritage constraints, it is therefore considered that the proposal has been designed to promote inclusivity compliant with London Plan Policy D7, and LBRT Policy LP 35.

Daylight and Sunlight

- 6.191 London Plan Policy D6 details that the design of the development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outdoor space.
- 6.192 LBRT Local Plan Policy LP 8 states that the design and layout of buildings should enable good standard of daylight and sunlight to be achieved in new development and in existing properties.
- 6.193 LBRT Local Plan Policy LP35 details that new buildings should be orientated to take account of need for sunlight and shading.
- 6.194 LBRT Emerging Local Plan Policy 46 requires development to ensure that the design and layout of buildings does not have an unacceptable impact on levels of daylight and sunlight on the host building or neighbouring properties.

Assessment – Daylight and Sunlight

- 6.195 A Daylight and Sunlight Report, prepared by Hydrock, has been prepared to consider the internal daylight and sunlight amenity of the proposed development, and its impact on existing neighbouring properties.
- 6.196 With regards to internal daylight amenity, the Daylight and Sunlight Report confirms that 63% of kitchens and living rooms and 35% the bedrooms achieve the required daylight factor criteria; and 55% of kitchens and living rooms and 91% of bedrooms achieve the No-Sky Line Contour (NSL) criteria.
- 6.197 The BRE guidance does not provide a target pass rate because performance heavily depends on the site context. Overall, Hydrock considers that the proposed development is deemed to be acceptable in terms of daylight given the limitations of existing buildings.
- 6.198 With regards to sunlight, the Daylight and Sunlight Report confirms that the development achieves BRE guidance of at least 50% of the space receiving 2 hours of sunlight or more on March 21st.
- 6.199 Furthermore, north facing units have been minimised with bedrooms oriented east and west where possible to maximise the amount of direct sunlight. Window sunlight availability has been assessed

using the Annual Probable Sunlight Hours (APSH) and Winter Probable Sunlight Hours (WPSH). 90% of units achieve the sunlight criteria.

- 6.200 The report has also assessed the impact of the development on daylight and sunlight received by adjacent properties. The report concludes that neighbouring properties would obtain sufficient daylight in line with the vertical sky component assessment. Furthermore, the sunlight availability received by adjacent properties would not be adversely affected.
- 6.201 The proposal has been carefully designed to maximise daylight and sunlight received to the proposed properties and would not have an adverse impact on neighbouring properties. It is therefore acceptable in terms of daylight and sunlight, in accordance with London Plan Policy D6 and LBRT Local Plan Policies LP 8 and LP 35.

Noise and Vibration

- 6.202 London Plan Policy D14 note that developments should avoid significant adverse noise impacts on health and quality of life as a result of new development. Furthermore, there is a need to mitigate and minimise the existing and potential adverse impacts of noise without placing unreasonable restrictions.
- 6.203 LBRT Local Plan Policy LP 10 notes that the Council encourages good acoustic design to ensure occupiers of new and existing noise sensitive buildings are protected. The following will be required, where necessary:
- a noise assessment of any new plant and equipment and its impact upon both receptors and the general background noise levels;
 - mitigation measures where noise needs to be controlled and managed;
 - time limits and restrictions for activities where noise cannot be sufficiently mitigated;
 - promotion of good acoustic design and use of new technologies; and
 - measures to protect the occupiers of new developments from existing sources.
- 6.204 LBRT Emerging Local Plan Policy 46 requires development to ensure there is no increases in traffic, servicing, parking, noise, light, disturbance, air pollution, odours or vibration.

Assessment – Noise and Vibration

- 6.205 A Noise Assessment, prepared by Hydrock, has been submitted as part of this application. The report identifies the primary noise source affecting the site as the Upper Sunbury Road. The south of the Site is also affected by the dredging of the settling lakes carried out by Thames Water. This occurs either monthly or every fortnight depending on demand, and mainly comprises construction type noise from moving plant and equipment. As a result of the noise levels from dredging activity, sound insulation inside the residential dwellings is recommended through the use of double-glazing window or acoustic trickle ventilation.
- 6.206 Mitigation is also required within the Site to mitigate any noise impact. An enhancement to the basic Building Regulations requirements will be necessary for the sound insulation between the basement cinema/gym space and dwellings above. A plasterboard ceiling in the basement gym/cinema in the Karlake Building is likely to be required. Further mitigation measures are recommended if the space is utilised as a gym.
- 6.207 In addition, enhancement to the basic Building Regulations requirements will be necessary for the sound insulation between the workshop and plant rooms and flats at the Ruston & Ward Building. A plasterboard ceiling is likely to be required.
- 6.208 Further mitigation measures may be required to mitigate external noise from the plant and prevent adverse impacts for users in the vicinity.
- 6.209 It is considered that these mitigation measures will ensure that new and existing occupiers are protected in line with London Plan Policy D14 and LBRT Policy LP 10.

Transport, Parking and Servicing

- 6.210 London Plan Policy T1 details that development proposals should contribute to the mayor’s target of 80% of all trips in London to be made by foot, cycle or public transport by 2041.
- 6.211 London Plan Policy T5 highlights that development proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. Cycle parking should be fit for purpose, secure and well-located, in accordance with the guidance contained in the London Cycling Design Standards development proposals should demonstrate how cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people.
- 6.212 London Plan Policy T6 states that car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity.
- 6.213 London Plan Policy T6.1 and T6.2 state that within Outer London locations with a PTAL of 2, maximum car parking provision for residential development is set at 1 space per unit, and the maximum car parking provision for office uses is set at 1 space per 100 sqm (GIA).
- 6.214 London Plan Policy T7 requires development proposals to facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible.
- 6.215 LBRT Local Plan Policy LP 10 states that the Council will seek to manage and limit environmental disturbances during construction and demolition. To deliver this the Council requires the submission of Construction Management Statements (CMS) for all major developments.
- 6.216 LBRT Local Plan Policy LP 30 details that the Council will support development that results in a pattern of land uses and facilities that encourage sustainable modes of travel such as safe cycling routes, attractive walking routes and easy access to public transport to reduce car dependency.
- 6.217 LBRT Local Plan Policy LP 44 states that the Council will work in partnership to promote safe, sustainable and accessible transport solutions, which minimise the impacts of development including in relation to congestion, air pollution and carbon dioxide emissions, and maximise opportunities including for health benefits and providing access to services, facilities and employment. The Council will:
- Encourage high trip generating development to be located in areas with good public transport with sufficient capacity.
 - Ensure that new development is designed to maximise permeability within and to the immediate vicinity of the development site through the provision of safe and convenient walking and cycling routes, and to provide opportunities for walking and cycling, including through the provision of links and enhancements to existing networks.
 - Ensure that major new developments maximise opportunities to provide safe and convenient access to public transport services.
 - Ensure that new development does not have a severe impact on the operation, safety or accessibility to the local or strategic highway networks. Any impacts on the local or strategic highway networks, arising from the development itself or the cumulative effects of development, including in relation to on-street parking, should be mitigated through the provision of, or contributions towards, necessary and relevant transport improvements.
- 6.218 LBRT Local Plan Policy LP 45 requires new development to make provision for the accommodation of vehicles in order to provide for the needs of the development while minimising the impact of car-based travel on the road network and local environment and ensuring making the best use of land. In addition, any servicing should demonstrate that it does not lead to severe impacts on the efficient and safe operation of the road network and no material harm to the living conditions of nearby residents.
- 6.219 LBRT Emerging Local Plan Policy 48 requires new development to make provision for the accommodation of vehicles to provide for the needs of the development while minimising the impact of car-based travel including on the operation of the road network and local environment and ensuring making the best use of land.

Assessment – Transport, Parking and Servicing

- 6.220 A Transport Statement, prepared by Markides, has been submitted as part of this application. The report demonstrates that the Site is accessible by a range of sustainable travel modes. The proposed development is in walking distance of Hampton Rail Station (6 minutes' walk) which provides regular service to Kingston, Clapham Junction and Waterloo.
- 6.221 Several bus stops are located within short walking distance of the Site. During the weekday peak period, there are up to 11 services per hour from the two bus stops located within closest distance of the Site. They provide a service to a range of locations, including Staines and Kingston.
- 6.222 The Site is also within walking and cycling distance of a range of local amenities at Hampton Village, including supermarkets, a sports centre, and a medical practice. The Site benefits from its access to good pedestrian and cycling infrastructure.
- 6.223 Although the PTAL rating of the Site is low (Level 2); it can be demonstrated that the Site is accessible by a range of sustainable transport modes. The Transport Statement notes that a recognised weakness of the PTAL methodology is that it does not take into account any qualitative appraisal of the public transport routes that are available, including journey times, destinations served and opportunities for ongoing connections. These parameters are very good for the Site.
- 6.224 The car parking provision will be compliant with London Plan policy requirements. 36 car spaces are assigned to the residential units and 3 spaces to the commercial use. The residential parking provision is below the maximum requirements detailed within the London Plan Policy, and the commercial provision meets policy requirements.
- 6.225 The enclosed Servicing and Car Park Management Plan demonstrates that the residential parking spaces are also in line with local car ownership statistics and the parking spaces on Site will be adequately managed. In addition, the parking survey demonstrates parking opportunities in the locality of the Site.
- 6.226 Significant cycle provision has been provided which exceed the cycle parking standards of the London Plan. The Cottages and Storehouse have individual cycle stores comprising 2 spaces. The Karslake Building ground floor store will comprise 41 spaces (double stacked and wall hung) and the Ruston & Ward Building will include 22 spaces (wall hung). There will also be 16 short stay spaces (cycle hoops) situated around the buildings.
- 6.227 The Transport Statement also assesses the future effect of the proposed development on the local transport network and demonstrates whether the planning application proposal can be successfully accommodated in terms of transport related matters.
- 6.228 The development proposals will result in a net reduction by seven trips in the AM peak and five trips in the PM peak, based on the full existing use of the Site. The report concludes that the effect of this level of change of traffic flows on the capacity of the surrounding network would be imperceptible and the effects of development traffic can be concluded to be negligible.
- 6.229 The servicing arrangement has also been carefully designed to ensure that it will lead to the efficient and safe operation of the road network and no material harm to the living conditions of nearby residents. The refuse and recycling bin storage will be located within the Site's boundary. The refuse collection arrangements will only include two-three additional stops within the site, and therefore any impact would not be detrimental. In addition, collection will take place on site, and without any reversing manoeuvres by large trucks.
- 6.230 The proposal has been designed to ensure it will have safe vehicular access and egress. There will be a one-way system access within the site, via the two currently unused simple priority junctions on Upper Sunbury Road, which will have visibility splays compliant with guidance.
- 6.231 The enclosed Heritage Report confirms that Site's boundary walls appear to have undergone previous alterations evidenced by the lack of uniformity. The existing piers at the proposed vehicle entrance point will be removed to allow the widening of the access point and re-integrated to the boundary with suitable brickwork. The brick wall at the exit point will be moved 0.9m southwards to allow visibility splays.

- 6.232 Following the refusal of the 2020 scheme, the design team has been in further discussion with TfL and LBRT to discuss the provision of a pedestrian zebra crossing facility at the junction of Upper Sunbury Road and Bears Hill. The proposed location would better connect the nearby community with the railway station, via Beards Hill. The surrounding community will also benefit from this new pedestrian crossing facility. The proposed pedestrian crossing is proposed to be secured via a s106 agreement.
- 6.233 The enclosed Construction Management Plan demonstrates how the proposal will reduce the impact of the construction, and includes measures to control working hours, noise, pollution, vehicle movements and waste during the construction phase.
- 6.234 It is therefore considered that the proposal will provide sufficient car and cycle provision and will not cause significant harm on the local highways network compliant with policy aims.

Trees and Landscaping

- 6.235 London Plan Policy G7 detail that development proposals should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees there should be adequate replacement. The planting of additional trees is encouraged in new developments.
- 6.236 LBRT Local Plan Policy LP16 states that the Council will require the protection of existing trees and the provision of new trees, shrubs and other vegetation of landscape significance that complement existing, or create new, high quality green areas, which deliver amenity and biodiversity benefits. In particular, they:
- Resist the inappropriate loss of trees, particularly those of townscape or amenity value;
 - Require that trees are adequately protected throughout the course of development, in accordance with British standard 5837 (trees in relation to design, demolition and construction recommendations); and
 - Encourage planting, including new trees, shrubs and other significant vegetation where appropriate.
- 6.237 LBRT Emerging Local Plan Policy 42 requires the protection of existing trees and the provision of new trees in accordance with London Plan Policy G7, as well as shrub, hedgerows and other vegetation of landscaping significance.

Assessment - Trees and Landscaping

- 6.238 The existing Site has limited soft landscaping which is overgrown with a sense of neglect. The proposals seek to provide high quality, green outdoor spaces wherever feasible, including a children's play area and communal gardens with grassy berm lawn and wildflowers. There is also a shared roof terrace above the rear extension to Karslake Building. Moreover, the setting to the listed buildings is enhanced with high quality landscaping and private gardens around the buildings.
- 6.239 Section 7 of the Design Access Statement sets out the landscaping strategy.
- 6.240 An Arboricultural Survey, prepared by RPS, has been submitted in support of this application, which reviews the existing trees and ensures the proposal integrates appropriately with the existing trees.
- 6.241 As the Site is located within the Hampton Village Conservation Area, any tree over 75mm in diameter measured at 1.5m above ground level is protected. One tree protected by a Tree Preservation Order (TPO) was identified which is an offsite Lime Tree (T11) to the southeast of the site. However, it is considered that it will not be impacted by the development because it is far enough away.
- 6.242 The Arboricultural Impact Assessment identifies the tree removals that will be required as a result of the proposed development. Additionally, the Assessment reviews the impact of the proposed construction works and provides recommendations to reduce this impact.
- 6.243 The Assessment outlines that tree T10, a Category B tree, will require removal to facilitate the proposed development. Furthermore T4, T5, T6, T7, T8, T9 and G1 are Category C trees, which are not viable for retention due to being low quality.

- 6.244 The proposal includes a significant number of new tree plantings as part of the soft landscaping scheme, a total of 35 new trees. This includes 11 proposed trees at the shared garden in front of Karslake building, 12 new trees to the east of Ruston & Ward Building, and 12 new trees along the internal southern access road. The landscaping scheme will significantly increase the total number of trees on site. The proposal also incorporates wildflower meadow within the shared gardens.
- 6.245 The Arboricultural Method Statement also provides protection methodology for retained trees throughout the demolition and construction period, including the above ground and below ground parts of the trees, as well as their rooting area. All tree works shall be carried out in accordance with BS3998:2010 and latest arboricultural best practice.
- 6.246 The proposal has therefore provided sufficient evidence to demonstrate that existing trees will be retained as much as possible, and that suitable measures have been introduced to ensure that these trees will be protected, in accordance with London Plan Policy G7 and LBRT Local Plan Policy LP 16.

Biodiversity

- 6.247 London Plan Policy G6 details that Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.
- 6.248 LBRT Local Plan Policy LP 15 details that the Council will protect and enhance the borough's biodiversity, in particular, but not exclusively, the sites designated for their biodiversity and nature conservation value, including the connectivity between habitats.
- 6.249 Weighted priority in terms of their importance will be afforded to protected species and priority species and habitats including National Nature Reserves, Sites of Special Scientific Interest (SSSI) and Other Sites of Nature Importance as set out in the Biodiversity Strategy for England, and the London and Richmond upon Thames Biodiversity Action Plans. This will be achieved by:
- protecting biodiversity in, and adjacent to, the borough's designated sites for biodiversity and nature conservation importance (including buffer zones), as well as other existing habitats and features of biodiversity value;
 - supporting enhancements to biodiversity;
 - incorporating and creating new habitats or biodiversity features, including trees, into development sites and into the design of buildings themselves where appropriate; major developments are required to deliver net gain for biodiversity, through incorporation of ecological enhancements, wherever possible;
 - ensuring new biodiversity features or habitats connect to the wider ecological and green infrastructure networks and complement surrounding habitats;
 - enhancing wildlife corridors for the movement of species, including river corridors, where opportunities arise; and
 - maximising the provision of soft landscaping, including trees, shrubs and other vegetation that support the borough-wide Biodiversity Action Plan.
- 6.250 Where development would impact on species or a habitat, especially where identified in the relevant Biodiversity Action Plan at London or local level, or the Biodiversity Strategy for England, the potential harm should:
- first be avoided (the applicant has to demonstrate that there is no alternative site with less harmful impacts),
 - secondly be adequately mitigated; or
 - as a last resort, appropriately compensated for.
- 6.251 The new Urban Greening LPG from the GLA requires that predominantly residential developments should aim for a UGF target of 0.4.

- 6.252 LBRT Emerging Local Plan Policy 38 requires major development to achieve an UGF of a minimum of 0.4 for predominately residential development.
- 6.253 LBRT Emerging Local Plan Policy 39 requires development to protect and enhance the borough's biodiversity and geodiversity.

Assessment - Biodiversity

- 6.254 An Ecology Assessment, prepared by RPS, assesses the ecological value of the Site, and recommends measures to support and mitigate any impact on notable and/or legally protected species.
- 6.255 A number of buildings on site were determined to have low, medium, and high potential for supporting bats. However subsequent surveys have determined that there are no bat roosts on-site. Furthermore, the low numbers of bats recorded during surveys conducted in 2019, demonstrates that the Site is not of significant importance to the foraging nature of bats.
- 6.256 Several common and widespread garden bird species were observed on site, and the Site is likely to support low numbers of breeding common species. Vegetation clearance should be conducted outside of the bird nesting season where feasible or carried out in line with the specific recommendations within the report.
- 6.257 In line with policy objectives, potential ecological enhancement measures have been provided within the ecology report to improve the Site for wildlife and to ensure the proposed development is ecologically friendly. The proposed lighting scheme has been designed with consideration of its impact on bats. It also recommends the installation of bat boxes, and native sedum blankets on the bin stores.
- 6.258 In turn, the Biodiversity Net Gain Assessment assesses that the Site will see an uplift of 2.01 habitat units, a 159.44% increase on baseline levels. The proposed development is therefore acceptable in ecological terms, in accordance with the requirements of London Plan Policy G6 and LBRT Local Plan Policy LP 15.
- 6.259 The submitted Urban Greening Factor Schedule states that the UGF for the scheme is 0.34, slightly below the target of 0.4. However, this scheme, whilst including mostly residential development, is mixed-use with 318.8 sqm of commercial floorspace. In addition to this, the limited scope of the Site due to the significance of the Grade II Listed Buildings and tight layout also limited the ability of the proposed scheme to deliver an UGF score of 0.4.

Air Quality

- 6.260 London Plan Policy SI 1 states that development proposals should be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas (AQMAs)).
- 6.261 LBRT Local Plan Policy LP 10 states that developers should secure at least 'Emissions Neutral' development and that, to consider the impact of introducing new developments in areas already subject to poor air quality, the following will be required:
- An air quality impact assessment;
 - Mitigation measures to reduce the development's impact upon air quality; and
 - Measures to protect the occupiers of new developments from existing sources.

Assessment – Air Quality

- 6.262 An Air Quality Assessment, prepared by Hydrock, has been submitted in support of this application, which describes and assesses the potential air quality impacts associated with the proposed development.
- 6.263 The Site is located within the borough wide Air Quality Management Area (AQMA) declared for nitrogen dioxide (NO₂).

- 6.264 The Air Quality Assessment outlines that impact from road traffic from the development would be negligible when compared to its current use. This is forecasted regardless of predicted improvements in the UK vehicle fleet.
- 6.265 Furthermore, the proposal should be able to mitigate any impact from construction site activities including dust when following guidance from the IAQM.
- 6.266 The building emissions associated with the proposed development are below the relevant Air Quality Neutral benchmarks; however, the transport emissions are above. As a result, mitigation measures are proposed to encourage cycling and use of sustainable transport options, through the provision of on-site cycle parking spaces, active electrical charging points at 20% of the parking bays, and provision of Welcome Park detaining information on sustainable transport options. A framework Travel Plan has been prepared with further details on sustainable travel.
- 6.267 Compliant with London Plan Policy SI 2 and Policy LP 10 of LBRT's Local Plan, an assessment has been prepared to assess the impact on air quality and mitigation measures are provided to reduce any potential impact.

Flood Risk and Drainage

- 6.268 Paragraph 165 of the NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future).
- 6.269 Paragraph 168 of the NPPF notes that the aim of the sequential test is to steer new development to areas with the lowest risk of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.
- 6.270 London Plan Policy SI 12 states that development should ensure that flood risk is minimised and mitigated. London Plan Policy SI 13 outlines that development should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.
- 6.271 LBRT Local Plan Policy LP 21 outlines that all developments should avoid, or minimise, contributing to all sources of flooding, including fluvial, tidal, surface water, groundwater and flooding from sewers, taking account of climate change and without increasing flood risk elsewhere. Development will be guided to areas of lower risk by applying the 'Sequential Test' as set out in national policy guidance.
- 6.272 LBRT Local Plan Policy LP 21 further requires the use of Sustainable Drainage Systems (SuDS) in all development proposals. Applicants will have to demonstrate that their proposal complies with the following:
- A reduction in surface water discharge to greenfield run-off rates wherever feasible; and
 - Where greenfield run-off rates are not feasible, this will need to be demonstrated by the applicant, and in such instances, the minimum requirement is to achieve at least a 50% attenuation of the site's surface water runoff at peak times based on the levels existing prior to the development.
- 6.273 LBRT Local Plan Policy LP21 states that in areas of extreme, significant and moderate breach hazard (as set out in the Council's SFRA), conversion or extensions to existing basements maybe permitted where they are not self-contained or used for bedrooms. There are no restrictions on new basements or extensions to existing basements in flood zone 1.
- 6.274 LBRT Emerging Local Plan Policy 8 requires all development to make safe for their lifetime and demonstrate that they avoid, minimise or reduce contributing to all sources of flooding.
- 6.275 LBRT Emerging Local Plan Policy 54 requires basements and subterranean developments to demonstrate the scheme safeguards the structural stability of the existing building, neighbouring buildings and other infrastructure, A Structural Impact Assessment will be required where a subterranean development or basement is added to or is adjacent to a listed building; also to

demonstrate that the scheme will not increase or otherwise exacerbate flood risk on the site or beyond.

Assessment – Flood Risk

- 6.276 A Flood Risk Assessment, prepared by Hydrock, has been submitted in support of this application. The report confirms that the Site is situated within Flood Risk Zone 1 and being at a low risk from all assessed sources of flooding.
- 6.277 The proposed development will not result in a loss of floodplain storage or redirect any surface water overland flows onto adjacent land / properties.
- 6.278 A Foul & Surface Water Drainage Strategy has been prepared which concluded a betterment will be provided with regards to the Site's drainage as the proposed SuDs permeable paving will slow down surface water flows to the existing sewer system and improve water quality.
- 6.279 A Basement Impact Assessment (BIA) has been prepared even though there are no proposals to create new basements or to alter existing basement areas. The submitted BIA considered that the proposed drainage strategy is a betterment than the existing surface water arrangement and the proposal would not present any land stability issues. Given that the basements are existing there will be no consequential loss of flood storage space. It is therefore concluded that there are no adverse impacts due to the proposed basement conversion.
- 6.280 LLFA (Environment Directorate London Borough of Richmond upon Thames) have confirmed their approval in principle based on an overall reduction of impermeable area, the use of permeable paving, and the limited availability of land available for extensive SuDs measures. (see Appendix F in the submitted Foul & Surface Water Drainage Strategy by Hydrock)
- 6.281 The proposals are therefore considered acceptable with regard to flood risk and drainage, and therefore accords with Paragraphs 159 and 162 of the NPPF, London Plan Policies SI12 and SI13, and LBRT Local Plan Policy LP 21.

Energy, Overheating and Sustainability

- 6.282 London Plan Policy SI 2 requires a minimum on-site reduction of at least 35% beyond Building Regulations for major development. Residential development should achieve 10% and non-residential development should achieve 15% through energy efficiency measures.
- 6.283 London Plan Policy SI 4 details that development proposals should reduce potential overheating and reliance on air conditioning systems.
- 6.284 London Plan Policy SI 5 outlines that development should encourage water supplies and resources to be protected and conserved in a sustainable manner.
- 6.285 LBRT Local Plan Policy LP 20 states that new development, in their layout, design, construction, materials, landscaping and operation, should minimise the effects of overheating as well as minimise energy consumption in accordance with the following cooling hierarchy:
- Minimise internal heat generation through energy efficient design;
 - Reduce the amount of heat entering a building in summer through shading, reducing solar reflectance, fenestration, insulation and green roofs and walls;
 - Manage the heat within the building through exposed internal thermal mass and high ceilings;
 - Passive ventilation;
 - Mechanical ventilation; and
 - Active cooling systems (ensuring they are the lowest carbon options).
- 6.286 LBRT Local Plan Policy LP 22 states that developments will be required to achieve the highest standards of sustainable design and construction to mitigate the likely effects of climate change. Applicants will be required to complete the following:

- Development of 1 dwelling unit or more, or 100sqm or more of non-residential floor space (including extensions) will be required to complete the Sustainable Construction Checklist SPD. A completed Checklist has to be submitted as part of the planning application;
 - Development that results in a new residential dwelling, including conversions, change of use, and extensions that result in a new dwelling unit, will be required to incorporate water conservation measures to achieve maximum water consumption of 110 litres per person per day for homes (including an allowance of 5 litres or less per person per day for external water consumption); and
 - New non-residential buildings over 100sqm will be required to meet BREEAM 'Excellent' standard.
- 6.287 Policy LP 22 notes that proposed developments are required to meet the following minimum reductions in carbon dioxide emissions:
- All new major residential developments (10 units or more) should achieve zero carbon standards in line with London Plan policy.
 - All other new residential buildings should achieve a 35% reduction.
 - All non-residential buildings over 100 sqm should achieve a 35% reduction.
- 6.288 Policy LP 22 also notes that energy efficiency should be achieved using the 'Be Lean, Be Clean, Be Green' Energy Hierarchy. It also encourages connection to decentralised energy networks where feasible.
- 6.289 LBRT Emerging Local Plan Policy 5 requires all development to prepare an Energy Strategy in accordance with the Mayors Energy Planning Guidance.
- 6.290 LBRT Emerging Local Plan Policy 6 requires development to achieve the highest standards of sustainable design and construction. Residential development is required to complete the Sustainable Construction Checklist.

Assessment - Energy, Overheating and Sustainability

- 6.291 An Energy Assessment, prepared by Hydrock, accompanies this application.
- 6.292 This application is compliant with policy both the residential and commercial parts of the development are expected to achieve a 35% reduction in CO2 emissions, when compared to an existing individual gas boiler baseline. The proposed development will use a communal ASHP system capable of reducing carbon emissions from the baseline utilising the use of renewable energy.
- 6.293 The Energy Assessment calculation of the net zero carbon shortfall to be 20.840 tonnes CO2/ year.
- 6.294 Measures will be implemented to reduce the demand for energy from the Site, promoting sustainability as detailed within the enclosed Sustainability Report and Checklist by Hydrock.
- 6.295 The development aims to source sustainable materials compliant with policy by utilising the BRE 'Green Guide to Specification' and other guidelines.
- 6.296 The proposal also aims to reduce water consumption through efficient sanitary ware and water-saving features.
- 6.297 In addition, measures will be implemented to reduce waste and pollution throughout the construction process, and recycling facilities will be provided for future users to reduce waste once the development is operational.
- 6.298 The Sustainability Report outlines how the development aims to meet BREEAM Domestic Refurbishment score of 'Excellent' and a BREEAM Refurbishment and Fit Out score of 'Excellent'.
- 6.299 An Overheating Assessment has been carried out within the Sustainability Report, which demonstrates that mitigation measures including mechanical ventilation (MVHR) will be required to prevent the building from overheating.

- 6.300 The details of the proposed MECHV strategy have been considered in detail, with elevation plans showing the details and location of the proposed intake and exhaust louvre air bricks on the façade of the listed buildings.
- 6.301 It is therefore considered that the development will incorporate numerous measures to promote sustainability compliant with policies within the Local Plan and London Plan.

Archaeology

- 6.302 London Plan Policy HC1 details that development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes.
- 6.303 LBRT Local Plan Policy LP 7 outlines that the Council will seek to protect, enhance and promote its archaeological heritage (both above and below ground), and will encourage its interpretation and presentation to the public. It will take the necessary measures required to safeguard the archaeological remains found and refuse planning permission where proposals would adversely affect archaeological remains or their setting. Desk-based assessments and, where necessary, archaeological field evaluation will be required before development proposals are determined, where development is proposed on sites of archaeological significance or potential significance.
- 6.304 LBRT Local Plan Policy 33 seeks to protect, enhance, and promote archaeological heritage, and will encourage its interpretation and presentation to the public.

Assessment – Archaeology

- 6.305 It should be noted that no designated World Heritage Sites, Scheduled Monuments, Historic Battlefield Sites or Historic Wreck Sites lie within the vicinity of the Site. In addition, the Site is not located within a designated Local Archaeological Priority Area.
- 6.306 An Archaeology Desk Based Assessment has been undertaken to assess the Site's below ground archaeological potential. It acknowledged that the proposed development is generally confined within the footprint of the existing buildings, where any archaeological remains would have already been subjected to severe impacts as a result of existing development.
- 6.307 The Desk Based Assessment confirms that the Site has low archaeological potential for all past periods of human activity. As a result of this limited potential, combined with the extent of past development impact and the scope of the development proposal, it is considered unlikely that the proposed development will have either a significant or widespread below ground archaeological impact. The Desk-Based Assessment recommends that no further below ground archaeological works are required.

Contamination

- 6.308 LBRT Local Plan Policy LP 10 states that the Council promotes, where necessary, the remediation of contaminated land where development comes forward. Potential contamination risks will need to be properly considered and adequately mitigated before development proceeds.

Assessment – Contamination

- 6.309 A Geo-Environmental Site Assessment, prepared by Hydrock, has been submitted to accompany the application.
- 6.310 The report assesses that the overall risk from land contamination for a residential use is moderate, but this would need to be confirmed by appropriate intrusive investigation, testing and assessment of the investigation results. Possible pollutant linkages and geotechnical risks also require further investigation and assessment.

- 6.311 It is anticipated that any contamination work required can be secured via condition. As such, appropriate measures will be taken to ensure that the development will not activate or spread contamination, in accordance with LBRT Policy LP 10.

Utilities

- 6.312 LBRT Local Plan Policy LP 23 states that new major residential or major non-residential development will need to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve the development. Planning permission will only be granted for developments which increase the demand for off-site service infrastructure where:
- Sufficient capacity already exists, or
 - Extra capacity can be provided in time to serve the development, which will ensure that the environment and the amenities of local residents are not adversely affected.

Assessment – Utilities

- 6.313 A Utility Report, prepared by Hydrock, accompanies this application. The report details the foul drainage strategy and confirms that the Thames Water system has sufficient capacity for the proposed foul flows.
- 6.314 On the basis of the above, the proposal will be acceptable with regard to utilities, in accordance with LBRT Local Plan Policy LP 23.
- 6.315 The following section considers potential Heads of Terms and planning obligations.

Fire Safety

- 6.316 London Plan Policy D12 relates to fire safety. Part A states that in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety.

Assessment – Fire Safety

- 6.317 A London Plan Fire Statement has been submitted as part of the application. It demonstrates that the development would meet the highest standards of fire safety.

7 HEADS OF TERMS

- 7.1 Under Section 106 of the Town and Country Planning Act (1990), as amended by the Planning and Compensation Act 1991, planning obligations can be used as part of the planning application process to address specific planning issues arising from a development proposal. They are intended to make a development acceptable which would otherwise be unacceptable in planning terms.
- 7.2 The NPPF notes that planning obligations should only be sought where they meet all of the following tests:
- Necessary to make the development acceptable in planning terms;
 - Directly related to the development; and
 - Fairly and reasonably related in scale and kind to the development.
- 7.3 LBRT adopted a CIL Charging Schedule in November 2014, which seeks £190 per sq.m for residential development in this location. The Mayoral CIL 2 came into effect in April 2019 and seeks £80 per sq.m for residential and commercial uses in LBRT.
- 7.4 LBRT Policy LP 28 states that development proposals for 10 or more residential units should assess the potential impacts on existing social and community infrastructure in order to demonstrate to the Council that there is sufficient capacity within the existing infrastructure to accommodate the needs arising from the new development. Section 13.3 of LBRT's Local Plan outlines that the Council may also seek planning obligations where appropriate to mitigate the impact of development.
- 7.5 LBRT Planning Obligations SPD (2014) sets out a list of potential planning obligations to mitigate any adverse impact on the environment or local services that arise directly as a result of the development. The Section 106 Heads of Terms will be discussed with the Council during the determination stage.
- 7.6 Based on the officer's reports of the refused 2020 scheme (ref: 20/1744/FUL), it is anticipated that the S106 Heads of Terms for a scheme of 36 residential units and 318.8sqm commercial floorspace will cover the following matters:
- Two Affordable Housing units;
 - Financial contribution of off-site playspace provision;
 - Financial contribution of the provision of pedestrian crossing facility on Upper Sunbury Road;
 - Carbon Offset Payment;
 - Travel Plan provision;
 - Employment and Skills Training; and
 - Council's monitoring, legal and professional costs.

8 OVERALL CONCLUSIONS

- 8.1 The proposed development is for:
“Conversion and extension of the site including Ruston and Karlake Buildings to provide 36 no. residential units (Use Class C3) and flexible business space (Use Class E(g)), associated car parking, access and landscaping works”.
- 8.2 The proposal has been carefully designed to revitalize this Site, whilst taking into account its historic value. The proposed extensions enable the regeneration of this historic Site to provide 36 high quality residential units and 318.8 sqm of commercial space.
- 8.3 The proposed development optimises the development of the site to deliver a high-quality mixed-use scheme, regenerating the existing decommissioned site to deliver new commercial space and residential homes.
- 8.4 The proposals include the conservation and re-use of the listed buildings at Hampton Waterworks and their conversion into a residential-led mixed-use development with a commercial element located in part of the Ruston & Ward Building. The proposals aim to retain and protect their architectural and industrial details that provide them with a special character whilst securing the future and long-term use of the historic buildings.
- 8.5 The existing buildings on Site were built for operational requirements as a water treatment works in Sui Generis Use with ancillary office/workshop and two residential units. Thames Water vacated the site in late 2019 due to the buildings being surplus to requirement and part of the Site has been left vacant for nearly three decades and in a dilapidated condition. The Site is a decommissioned infrastructure facility and was never a significant employment generating use.
- 8.6 Due to the condition of the heritage assets on site, there is a need to ensure the restoration of Grade II listed buildings and to put the buildings into optimum viable use. A viability assessment has been carried out which concludes that the proposed development would constitute the optimum viable use and the minimum level of enabling development required to safeguard the future of the Grade II listed buildings on site.
- 8.7 LBRT Local Plan Policy LP 42 states that the loss of non-designated industrial space will only be permitted where it is supported by a two years’ marketing exercise after which a sequential approach to redevelopment should be applied. The marketing campaign has been carried out since January 2018 however no offer was received to occupy the buildings in their existing condition. The commercial agent commented that the Site is in a dilapidated condition and requires substantial alterations to provide suitable accommodation for industrial users. Moreover, the listed buildings status and the limited on-site parking provision prohibit the modifications required to make the buildings suitable for alternative business occupiers or community uses. The existing buildings are not suitable for modern business requirement for industrial or storage uses due to the differential in floor levels and the restrictions to undertaking alterations to the listed buildings. Whilst there were limited interest from uses such as health clinics, nursery/creche, educational or leisure uses, the Site lacks the necessary outdoor space for amenity (e.g., school playground) and the lack of sufficient operational and visitor parking spaces for these uses rendered these options unfeasible. The marketing exercise has been undertaken since 2018 with no firm interest received from a wide range of different businesses.
- 8.8 In line with policy requirement, alternative futures uses including offices and community uses have been explored in terms of the suitability of the Site. However, these uses would generate high transport movements and have high on-site parking requirement which cannot be accommodated on site. On the other hand, the Site is capable of providing an acceptable level of residential amenity and servicing provision and would not result in any adverse impact on neighbouring buildings.
- 8.9 Due to the need to provide a residential-led mixed use scheme and the constraints to further extension because of the listed buildings status, it is not feasible to retain the same amount of non-residential floorspace on site. In response to Policy LP 42, the scheme has sought to provide the maximum level of employment floorspace whilst achieving a viable scheme. It is proposed to provide flexible Class E(g) use at the Ruston & Ward eastern workshop as it would be accessible from the existing pedestrian entrance off Lower Sunbury Road, and acts as a transitional space between the

continued Thames Water operation to the southern workshop and the proposed residential conversion. The refurbished commercial floorspace would be of high quality and flexible, adaptable for a variety of commercial uses and suitable for small and medium size businesses. The proposed commercial floorspace would generate more employment than the existing use, in a floor area which is 15% of the previous Sui Generis use on site.

- 8.10 Following the refusal of the 2020 scheme (ref: 20/1744/FUL and 20/1742/LBC), further pre-application meetings were held with LBRT and Historic England to assist in informing a revised scheme. The original scheme and the revised scheme have been subjected to extensive pre-application discussions to determine the acceptability of the change of use, the level of interventions to the historic fabric of the buildings and the development's detailed design.
- 8.11 The revised scheme has taken on board the comments received from LBRT pre-application discussions, DRP and Historic England.
- 8.12 A summary of the key changes to this revised scheme when compared to the refused scheme ref: 20/1744/FUL and 20/172/FUL are as follows:
- Reduction of residential units from 37 units to 36 units.
 - Refinement of the roof extension design at the low-level boiler houses, with a lower pitched roof and less glazing panels.
 - Provision of detailed identification and classification of heritage fabric.
 - Placement of historic machinery to the grounds of the site to raise public appreciation of the site's architectural and historic interest.
 - Installation of heritage information boards within the site.
 - Rear extension of the Karlake Building now has matching brick and recessed aisles to match the host building.
 - Storehouse rear extension area reduced by 18%.
 - Relocation of the children play area to the rear of Karlake Pumphouse West
 - Introduction of communal Air Source Heat Pump.
 - Introduction of green roof at the Storehouse rear extension and the communal ASHP plant enclosure.
 - Enhanced landscaping proposal including additional trees along the southern, eastern and northern boundary.
- 8.13 Most particularly in June 2023, Historic England in their written advice noted that they would be unlikely to raise any objections to the revised proposals.
- 8.14 On balance, in accordance with Paragraphs 202 and 203 of the NPPF, the harm to the historic fabric has to be weighed against the strong planning benefit of securing the heritage assets' long-term future through a sustainable optimum viable use, and to revitalise this vacant site.
- 8.15 The proposal will provide 36 high quality residential units with a mix of unit size suitable for family housing and with option for downsizing. The revised scheme includes the provision of two affordable units. In addition, a range of new landscaping and environmental improvements will be delivered across the site.
- 8.16 The revised proposal is a fundamentally heritage-led scheme which establishes a viable long-term use of the listed buildings on site, securing their future and offers significant opportunities for public engagement. The latest scheme includes detailed records of the existing historical fabric on site, retention of the existing historical fabric and existing pumphouse machinery and raise greater public appreciation of the site.
- 8.17 On balance, it is considered that the proposed alteration and extension to the listed buildings on site to create a residential-led commercial development would deliver overwhelming planning benefits by bringing the vacant derelict heritage assets back into active use, securing the future of the listed

buildings, and providing much need residential units and flexible commercial floorspace in a high-quality, sensitive heritage renovation and refurbishment of the buildings on the site.

APPENDIX 1

Marketing Report 2020

APPENDIX 2

Historic England Written Advice June 2023

APPENDIX 3

Public Benefit and Intervention Statement Summary (Extract for LOM document)

Summary **Planning Assessment**

The Table Below Summarises Key Benefits and Interventions.

Benefits

We have amplified scheme benefits by exploring ways that we can make the heritage assets more accessible and appreciable through through site based interpretation boards and digital links.

1. **Life and Vitality** - The proposed development will secure viable, long term mixed uses of the buildings. The proposed residential and commercial conversion ensures their ongoing maintenance and management.
2. **Safeguarding Heritage** - While appropriately managed as vacant structures, the buildings require urgent repair and renovation to safeguard their architectural and historic interest. A schedule of repair and alteration has been submitted, demonstrating how the scheme identifies and integrates historic fabric as the basis of the proposals. Significant alteration, where introduced, is proportionate to the need to undertake change to support viable new uses.
3. **Greater Access to Heritage Assets** - The proposed development incorporates varied measures to raise public appreciation of the Site's architectural and historic interest. Public engagement measures range from on-Site interpretation boards, explorable, shareable virtual information delivered through QR codes and options for partnership with local interest groups. These measures deliver a range of 'access' options to future occupants and the public, vastly enhancing present opportunities to appreciate and understand the Site's significance as an important heritage asset.
4. **Gateway to Hampton** - Creating a gateway into the area through uplift and vitality.
5. **New Homes** - Creation of 36 new homes in the area, which is an important contribution to housing need in the borough. The units will be unique and will be an important addition to the variety of housing stock that is available.
6. **Affordable Homes** - Creation of 2 social rented family units with gardens on site through local Housing Association. This is a good contribution to affordable housing need.
7. **Employment Space for Job Creation** - Economic benefits from the development with the creation of construction jobs and 21 to 40 new office / co-working jobs through the new commercial space to be provided.
8. **Sustainable Development** - Highly sustainable new homes that deliver an industrial heritage placemaking led scheme.
9. **Additional Trees and Biodiversity** - 8. Additional urban greening and trees supporting greater biodiversity on the site. The pre-development site scores a total of 1.26 habitat units and 0.00 hedgerow units with the post development creation and retention providing 3.27 habitat units and 0.08 hedgerow units which is an overall net gain of +159.44% habitat units and 100% hedgerow units. We are losing one Category B tree and several Category U trees. However there will be an increase in the total number of trees as seven new trees will be planted.
10. **Financial Contributions to Local Infrastructure** - CIL contributions circa £660,800 and \$106 contributions including employment and skills training, including an improved pedestrian crossing along Upper Sunbury Road.

Key interventions

The following set out the key interventions to the building that have evolved substantially over the course of extensive consultation with the Local Planning Authority and Historic England. These are summarised below and further detail is provided through appendices to this document.

1. **Roof extensions** - The roof extensions have been refined over some 5 iterations and again since our last consultation to reduce their visual impact and these are presented in the attached summary. These refinements mean that the current proposal is within the existing roof ridge heights and presents a very minimal profile with deep overhanging eaves and shadow lines as requested by the LPA heritage officer. The extensions have also be drawn away from the pump houses to reveal more of the arched windows to the adjacent walls. - refer to the iterations and detailed illustration of the latest proposal
2. **Rear building extensions** - These have also been refined since the last HE consultation in line with comments from the LPA Heritage Officer and DRP and we understand are now considered acceptable.
3. **Subdivision of space** - It is acknowledged that the internal layout of the building will change through the introduction of new uses/spaces. In the evolution of the proposals, alterations have been made to the apartment configurations to further improve the open roof spaces to the penthouses and, embeds retention of historic features, including windows and supports the legibility of original use. The roof structures and lifting beams in the towers are exposed and open to the dwellings below and almost all significant windows are open to double height volumes. The impact of cellular space has therefore been minimised. Partition, cellular spaces and introduction of modern fabric has been minimised as a key design principle.
4. **Retention of Heritage Fabric** - As requested, a Gazetteer of Heritage Fabric has been compiled that identifies the relative significance of fabric across the building. The Gazetteer has informed the provision of a schedule of change and retention. Great effort has been employed to retain the majority of key fabric and features in situ, with limited instances of the relocation of features within in site. The success of the detailed assessment and design process means that only the wrought iron roof structures to the engine houses on R&W and Karslake will be removed. The majority of historic fabric and features have been integrated to the proposals and this is detailed in the attached detailed summary. This applies to both internal and external elements, with change being proportionate to the introduction of viable future uses.
5. **Enhancing Appreciation of Heritage Engineering Features** - A number of key items are being retained on site and are fundamental to establishing the proposed development's character and sense of place. Please refer to the schedule and drawings conveying retention and location of these features.