

**No.10 Orleans Road, Twickenham,
TW13BL**

**Planning and Heritage
Statement**

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TW1 3BL**
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March 2024



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1. Introduction

1.1.1. This Planning and Heritage Statement has been prepared by PMV Planning on behalf of Jacqui Norris in support of an application seeking full planning permission for the conversion of the existing building to provide two dwellings plus external alterations.

1.1.2. The application is submitted to the London Borough of Richmond upon Thames (LPA) as part of the application submission for the following:

“Change of use of the building from vacant commercial use to two dwellings plus external alterations”.

1.1.3. This Planning and Heritage Statement assesses the proposed scheme against the Development Plan and any other material planning considerations.

1.1.4. It should be read in conjunction with other supporting information submitted which comprises;

- Completed and signed planning application and CIL Forms;
- Cover Letter, prepared by PMV Planning;
- Site Location Plan, prepared by 2C Architects;
- Existing and proposed drawings (full drawing schedule enclosed in **Appendix 1**, prepared by 2C Architects;
- Design and Access Statement, prepared by 2C Architects;
- Transport Statement, prepared by Magna Transport Planning Ltd;
- Outline Construction Management Plan, prepared by Magna Transport Planning Ltd;
- Energy and Sustainability Statement (including BREEAM Domestic Refurbishment Pre-Assessment), prepared by XCO2;
- Sustainable Construction Checklist, prepared by XCO2;
- Financial Viability Assessment (including the Commuted Sum Calculation), prepared by Grimshaw Consulting Limited;
- Fire Safety Strategy, prepared by Fire Safety London;
- Marketing Report, prepared by Michael Rogers LLP; and
- Water Usage Calculator.

1.1.5. The remainder of the Planning and Heritage Statement is set out as following:

- **Section 2** describes the application site, site designations and planning history;
- **Section 3** describes the proposed development;
- **Section 4** sets out the evolution of the scheme following pre-application engagement and consultation;

- **Section 5** – sets out the relevant planning policy framework;
- **Section 6** assesses the planning considerations;
- **Section 7** assesses the heritage considerations; and
- **Section 8** - sets out our summary and conclusions.

2. Site and Surroundings

The Application Site and Surrounding Context

- 2.1.1. The application site is approximately 0.1 ha in size and is located on Orleans Road within the London Borough of Richmond upon Thames. The site is bounded by Chapel Road to the north, Orleans Road to the west, and residential terraces to the south and east.
- 2.1.2. Orleans Road is a relatively narrow street leading to the River Thames from Richmond Road and is residential in character. The residential properties along Orleans Road comprise predominately of period terrace housing of mainly two and three storeys. To the south of Orleans Road, many of the houses are detached dwellings of varying size, style and height. The Old Chapel is located opposite the site, to the west of Orleans Road and is a Building of Townscape Merit (BTM).
- 2.1.3. The site currently comprises a dated, tired and unmodernised 1.5 storey building previously used for employment uses. Historically the building was used as a car repair garage by the Orleans Motor Car Company in the 19th Century. In more recent years, it is understood that the building was used for light industrial operations but has been vacant for the past four years, despite marketing and was used for storage for approximately 20 years prior to this.
- 2.1.4. The building is situated directly on the corner of Orleans Road and Chapel Roads and is built of mixed stock bricks with red brick band detail, and window heads. It has a simple pitched tiled roof with an end gable and raised parapet facing Chapel Road. The façade facing Chapel Road has a single double casement on the ground floor with a smaller window above, with three similar windows and an entrance with fanlight on Orleans Road.
- 2.1.5. The site has good public transport access and has a PTAL rating of 3. St Margarets overground station is located within approximately 0.5km to the north of the site and provides direct links to central London as well as Southwestern Railway trains services providing links across the UK. Twickenham town centre is also within walking distance.
- 2.1.6. The existing property is not statutorily or locally listed, although it is located within Twickenham Riverside Conservation Area.
- 2.1.7. The site is located in flood zone 1 which has the lowest probability of flooding.

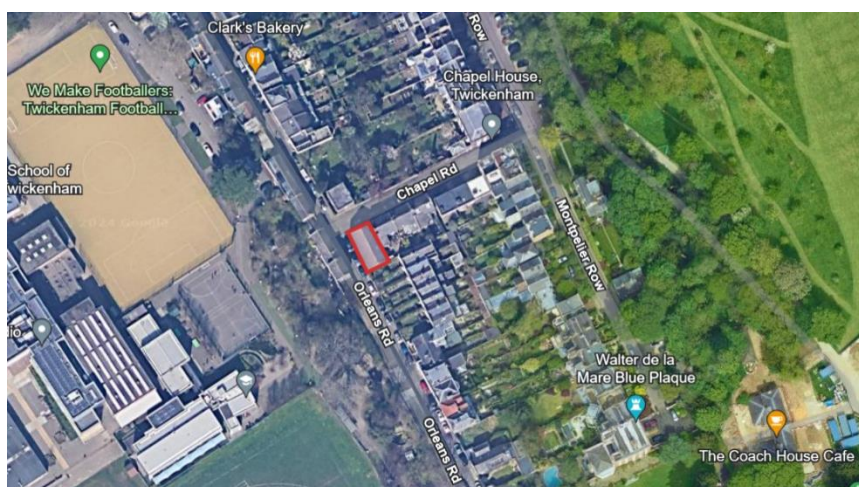


Figure 1. Site Location



Figure 2. Existing Site

3. The Proposal

- 3.1.1. The site represents a significant placemaking opportunity to bring a tired, dated and vacant building back into a vibrant and active use that positively adds to the quality of the local area.
- 3.1.2. The proposal is for the conversion of the existing building, which has been vacant for the last four years and used for storage for approximately 20 years prior to this into two new high quality and environmentally sustainable family homes.
- 3.1.3. Minor external alterations are required to facilitate the conversion into two family homes. The external alterations include the addition of dormer windows at the front and windows in the gable end plus rooflights as well as new access doors.
- 3.1.4. The scheme will be of high-quality design with architectural details that references the surrounding context and the scheme is compatible with the neighbouring residential properties along Orleans Road and Chapel Road.
- 3.1.5. Key elements of the design approach have ensured that the proposed conversion and external alterations enhances the character and appearance of the Twickenham Riverside Conservation Area.
- 3.1.6. The new homes have been carefully designed in accordance with the National Space Standards and have been arranged to be dual aspect achieving the best possible outlook. The scheme is proposed to be car free and will include two cycle parking spaces to promote sustainable transport modes. The pedestrian access will be taken from Orleans Road and Chapel Road.



Figure 3. The Proposed Scheme

4. Pre-Application Engagement and Consultation

- 4.1.1. The evolution of the proposed development has been informed by pre-application engagement with the LPA.
- 4.1.2. A pre-application request was submitted to the LPA and written pre-application advice was received on 6 September 2022. A copy of the written feedback has been enclosed within **Appendix 2**.
- 4.1.3. As noted in the pre-application written advice, officers requested that further evidence is submitted to support a planning application demonstrating that there is no longer a demand for an industrial/employment use in this location as well as applying a sequential approach.
- 4.1.4. The pre-application advice recognised that there may be no scope to include private amenity space due to design concerns and advised that the scheme should provide family accommodation.
- 4.1.5. The pre-application advice recommended that any external alterations to the existing building are kept to a minimum and confirmed that given the proposed use, scale and nature of the external alterations, it is not envisaged that any concerns regarding neighbour amenity impact will arise.
- 4.1.6. Responding to the pre-application advice, key design changes to the scheme include the following:
- The internal space has been designed to create 2 x 2b 4p homes and the meet the Local Plan definition for family housing;
 - Removal of a French door and balcony at first floor level and provision of an external courtyard at ground level;
 - More sympathetic material palette;
 - Dormer windows reduced in size to appear more subservient to host building; and
 - Replacement of existing roof tiles with high quality hand made clay roof tiles in a colour tone to complement the surrounding context.
- 4.1.7. In November 2023, a letter was circulated to neighbouring residents informing them of the proposals. A copy of the letter is enclosed at **Appendix 3**. No comments have been received from neighbouring residents.

5. Planning policy

- 5.1.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.1.2. The proposals are designed to accord with all relevant national, regional and local planning policy and guidance. Broadly speaking, policy and guidance at the national and regional levels highlight a pressing need for more housing and promotes the efficient use of urban land at sustainable locations to meet this need.
- 5.1.3. The relevant Development Plan for the site comprises:
- London Plan (2021); and
 - London Borough of Richmond upon Thames Local Plan (2018).

London Plan (2021)

- 5.1.4. The following London Plan policies are of relevance:
- Policy GG2 making best use of land;
 - Policy GG4 Delivering the homes Londoners need;
 - Policy D4 Delivering good design;
 - Policy D5 Inclusive design;
 - Policy D6 Housing quality and standards;
 - Policy D12 Fire safety;
 - Policy H1 Increasing housing supply;
 - Policy H2 Small sites;
 - Policy H10 Housing size mix;
 - Policy E4 Land for industry, logistics and services to support London's economic function;
 - Policy HC1 Heritage conservation and growth;
 - Policy SI 2 Minimising greenhouse gas emissions;
 - Policy SI 3 Energy infrastructure;
 - Policy SI 4 Water infrastructure;
 - Policy T5 Cycling; and
 - Policy T6 Car parking.

Richmond Local Plan (2018)

5.1.5. The following Local Plan policies are of relevance:

- Policy LP1 – Local Character and Design Quality;
- Policy LP8 – Amenity and Living Conditions;
- Policy LP10 – Local Environmental impacts;
- Policy LP22 – Sustainable Design and Construction;
- Policy LP23 – Water Resources and Infrastructure;
- Policy LP24 – Waste Management;
- Policy LP34 – New Housing;
- Policy LP35 – Housing Mix and Standards;
- Policy LP36 – Affordable Housing;
- Policy LP40 – Employment and Local Economy;
- Policy LP44 – Sustainable Travel Choices; and
- Policy LP45 - Parking Standards and Servicing.

National Planning Policy Framework (NPPF)

5.1.6. The revised National Planning Policy Framework (NPPF) was published on 20 December 2023. This sets out the government's planning policies for England and how these are expected to be applied.

5.1.7. Both the NPPF and NPPG are important material considerations in the determination of planning applications. Central to the NPPF is the presumption in favour of sustainable development in paragraph 11. It advises that, for decision-taking, this means approving development proposals that accord with the Development Plan without delay.

5.1.8. Paragraph 60 makes reference to the Government's objective of significantly boosting the supply of homes.

5.1.9. Paragraph 123 states that decisions should 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.

5.1.10. Paragraph 123 further notes that decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs.

5.1.11. Paragraph 127 states that Local planning authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans. This includes the use of employment land for homes.

6. Planning considerations

Principle of development

- 6.1.1. The scheme seeks planning permission to convert the existing vacant building from commercial/industrial use to two new family homes.
- 6.1.2. The key principle at the heart of the NPPF is the presumption in favour of sustainable development (paragraph 11). Section 11 sets out that the decisions should encourage the effective use of land by re-using land previously developed (ie brownfield land) and the planning system should proactively drive and support sustainable development for new homes and other uses by promoting new development to encourage the re-use of land in urban areas and meet housing need as a priority.
- 6.1.3. There is support for the redevelopment of this site at all levels of policy. Specifically, paragraph 124 of the NPPF states that planning decisions should:
- “Promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing.”*
- 6.1.4. Paragraph 127 further states that Council's should take a positive approach to developing employment land for homes in areas of housing demand.
- 6.1.5. Policy LP 42 notes that a loss of industrial space will only be permitted where robust and compelling evidence is provided to demonstrate that there is no longer demand for an industrial base in this location and then a sequential approach to the redevelopment is undertaken. This sequential approach is firstly the redevelopment for office or alternative employment uses and then mixed use including other employment generating uses.
- 6.1.6. A marketing feasibility report has been prepared by Michael Rogers LLP and supports the application. The marketing report notes that over the past two to three years, there has been very little interest from potential employment occupiers. Specifically, during the marketing period Michael Rogers LLP have shown the units to twenty-two parties and have received no offers. The property continues to be marketed today.
- 6.1.7. The report concludes that Michael Rogers LLP marketing over this period has not generated any serious interest in the property from occupiers since December 2020 and see no reason why circumstances should change over the course of the next few years, particularly having regard to the surplus of vacant commercial accommodation in the area.
- 6.1.8. As such, the marketing report demonstrates that to date, no meaningful offers have been received for the site. A summary of the enquiries in the site is set out in the marketing report. Whilst there has been some initial interest in the site, no offers have been received. When queried as to why, the reasons were identified as:
- Access is unsuitable;
 - Too remote location;
 - Height of property was too low for shelf system;
 - Natural light not suitable enough; and
 - Space is not flexible enough.

- 6.1.9. The site was therefore considered not to be suitable by any of the operators and commercial occupiers are deterred by the evident site constraints. Therefore, there is no demand for an employment based use in this location and there is not likely to be in the foreseeable future.

Sequential Test

- 6.1.10. LB Richmond Policy LP42 supporting text notes, that where the Council is satisfied that a full and proper marketing exercise has been undertaken and that there is no demand for continued industrial use on site, then redevelopment or change of use may be appropriate provided the sequential approach to redevelopment is adhered to.
- 6.1.11. Policy LP42 supporting text provides a two step sequential approach as follows:

“The first step in the sequential test is consideration of alternative employment generating uses. These uses should include in the first instance B Use Classes such as offices and if these are not practicable then social infrastructure and community uses such as health clinics, nurseries and creches, leisure facilities or other uses identified for community purposes.

The second step in the sequential test is for mixed use development including other employment generating or community uses. Proposals for mixed use schemes should maintain or improve the amount of employment floorspace on site.”

Office Use

- 6.1.12. The site is not located within one of the main borough centres and outside of a Key Office Area. An office use would generate significantly more car trips than industrial uses which are associated with employees visitors and servicing.
- 6.1.13. Therefore, given the predominately residential character of Orleans Road, narrow width of the road, out of town centre location and lack of any off-street parking, and for reasons set out in para 6.1.8 above, the site has exceptionally severe site restrictions that would render an alternative employment use inappropriate.
- 6.1.14. As such, it can be concluded that proposals for an office scheme on the site would not be appropriate for the site and fail to meet Local Plan Policy LP41.
- 6.1.15. As noted above, where office uses are deemed inappropriate, then proposals should look to the provision of social and community use on the site.

Social and Community Uses

- 6.1.16. Local Plan Policy LP28 relates to the delivery of new social and community infrastructure and notes that proposals for these land uses will be supported where:
1. It provides an identified need;
 2. It is of high quality and inclusive design providing access for all; and
 3. Where practicable is provided in multi-use, flexible and adaptable buildings or co-located with other social infrastructure uses which increases public access.
- 6.1.17. The Infrastructure Delivery Plan (2023) (IDP) provides the most up to date summary of the Boroughs current infrastructure shortfalls and future needs and demands for the borough to support new development and growing population.
- 6.1.18. The IDP notes that there may be a medium/long-term need for additional primary school capacity. In terms of library uses, the IDP notes that the Council will seek to provide safe and welcoming library buildings for residents.

- 6.1.19. In terms of healthcare provision, it is noted that there will be demand for additional capacity and most practices are fully utilising space.
- 6.1.20. The remainder of the infrastructure demands highlighted within the IDP relate to uses inappropriate for the site, such as sports facilities and are therefore not considered as part of this application.
- 6.1.21. As noted above, the Site is not located within one of the main borough centres, and Orleans Road is narrow in width and lacks any off-street parking. It is therefore considered that any of the above uses would lead to a significant increase in car trips leading to congestion and impacts on the local highway network.
- 6.1.22. As noted above, where social and community uses are deemed inappropriate, then proposals should look to the provision of mixed uses on the site.

Mixed Use

- 6.1.23. The above analysis has demonstrated the inappropriateness from a site characteristic perspective for an entirely commercial or community scheme on the site. Given the reasons set out above, a mixed use scheme would be inappropriate in this location.
- 6.1.24. The proposals would therefore accord with the sequential test noted within supporting text to Policy LP42.

Design

- 6.1.25. The vision and design rationale for the proposed development throughout has been to create an exceptional residential scheme which has quality architectural design inside and out. The quality of design would create an attractive street-scene along Orleans Road.
- 6.1.26. High quality design is advocated for at all levels of planning policy. National planning policy has high quality design at its heart.
- 6.1.27. Furthermore, paragraph 139 of the NPPF states development that is not well designed should be refused.
- 6.1.28. London Plan Policy D3 requires development to make the best use of land by following a design-led approach that optimises the capacity of the site. Policy D6 states that development should be of high quality design and provide adequately-sized rooms.
- 6.1.29. At a local level, Local Plan Policy LP1 sets out that the Council will require all development to be of high architectural and urban design quality. The high-quality character and heritage of the borough and its villages will need to be maintained and enhanced where opportunities arise.
- 6.1.30. Key elements of the design approach have ensured that the proposed development is of the highest quality both for future users and the local community, without compromising the area's character, existing context and local amenity. Careful consideration has been given to the massing and elevational treatments to enhance the character of the surrounding area.
- 6.1.31. The proposed roof dormers along Orleans Road are designed to relate, in terms of rhythm, scale and proportion to the existing windows below. The scale of the dormers has been subject to much analysis and testing to ensure that any perceived visual impact was addressed and they appeared subservient to the host building.
- 6.1.32. The design approach to the new windows at the south facing gable end has been to align with the existing openings and simply infill the space between with new openings. The design will improve outlook and privacy.

- 6.1.33. Further details are set out in the Design and Access Statement, prepared by 2C Architects. Overall, the proposed scheme will deliver two new high quality family homes and is in accordance with the Local Plan, London Plan and the NPPF.

Residential quality

- 6.1.34. London Plan Policy D6 sets out that housing development should be of high quality design and provide adequately-sized rooms with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners. This policy further sets out that housing development should maximise the provision of dual aspect dwellings and developments are required to meet minimum standards.
- 6.1.35. Local Plan Policy LP35 sets out that all new housing development should comply with the Nationally Described Space Standards. Local Plan Policy LP35 sets out that adequate external space should be provided for all new housing development.
- 6.1.36. The proposed new homes will exceed the minimum internal space standards as set out in the London Plan Policy D6. This is summarised in Table 1 below. Further, the room sizes are designed to meet the requirements of the Nationally Described Space Standards (Department for Communities and Local Government March 2016) and the Mayor of London's Housing SPG.

	National Space Standard (sqm)	Proposed Floorspace (sqm)
Unit A (2b 4p)	79	102
Unit B (2b 4p)	79	100

Table 1. Proposed Floorspace

- 6.1.37. The Local Plan defines family housing as the following:

“Family housing is generally defined as having three or more bedrooms, however if of a suitable size (meeting the Nationally Described Space Standard and the external amenity standards) a two bedroom property can be designed for 3 or 4 persons and would be considered as family housing.”

- 6.1.38. The proposed new homes meet the Local Plan definition for family housing given the internal sizes and exceeding the minimum space standards.
- 6.1.39. London Plan Policy D6 states that a minimum of 5 sqm of private outdoor space should be provided for each one to two person dwelling and an extra 1sqm should be provided for each additional occupant.
- 6.1.40. The scheme does not propose private amenity space due to the site's constraints given the size and layout of the existing building and proximity to neighbouring buildings. Following the Pre-Application advice received from the LPA, the provision of balconies have been removed from the scheme due to design concerns.
- 6.1.41. However, the application site is located approximately 150m and therefore within short walking distance from Marble Hill Park. As such, the Park provides a highly accessible open space for both new homes which provides a high quality environment that contributes positively to mental and physical health as well as general wellbeing.
- 6.1.42. The proposed new homes have been designed from the inside out and there has been

careful arrangement of living spaces to ensure that the potential width and outlook of internal living rooms has been fully optimised. Each new house has been designed to ensure the maximum amount of light into each property and create an optimum internal environment.

- 6.1.43. Access into the new homes would be directly from the street. The new entrance doors will have a minimum clear opening width of 850mm when measured in accordance with the requirements of The Approved Documents Part M4(2).

Neighbouring Residential amenity

- 6.1.44. London Plan Policy 7.6 seeks to ensure that buildings do not cause unacceptable harm to the amenity of surrounding land.
- 6.1.45. Local Plan Policy LP8 sets out that all development will be required to protect the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties.
- 6.1.46. The proposed homes have been orientated so that the windows are facing west onto Orleans Road and north facing Chapel Road and therefore, there will be no loss of privacy or sense of overlooking. Furthermore, the proposed rooflights have been carefully positioned so that they will not cause loss of privacy to neighbouring properties.
- 6.1.47. In terms of physical relationship with other properties, the scale, height and massing of the development is sympathetic to the existing building and will continue to sit lower than the neighbouring properties as well as The Old Chapel located west of Orleans Road.
- 6.1.48. Indeed, new homes in this location replacing an employment/industrial use, will improve the quality and the attractive living environment for the Orleans Road street scene which is a quiet residential street.

Transport

- 6.1.49. The application is accompanied by a Transport Statement, prepared by Magma Transport which assess the impacts of the proposed development on the surrounding highways network. In regard to trip generation, the proposed development is minor in nature and will not materially increase trips to and from the site so as to have discernible impact on the surrounding road system. The scheme does not propose to provide any on-site car parking spaces which is no different to the existing building.
- 6.1.50. The Transport Statement notes that there could be a small increase in pedestrian trips as a result of the proposed development. However, given the site and surrounding area, an increase of eight two-way pedestrian trips on a daily basis equates to an average of no more than one trip per hour, which is imperceptible and unlikely to put any pressure on pedestrian infrastructure.
- 6.1.51. Each new home will include two cycle parking spaces and so overall, the scheme will provide a total of four-cycle parking spaces in compliance with London Plan Policy T5 and T6.
- 6.1.52. The Transport Statement concludes that there is no evidence to suggest that the proposed scheme would result in demonstrable 'severe' harm to the local highway or sustainable transport network.

Energy and sustainability

- 6.1.53. London Plan Policy SI2 sets out that residential development should achieve a minimum on-site reduction of at least 10% beyond Building Regulations.
- 6.1.54. Local Plan Policy LP 20 sets out that new development, in their layout, design, construction, materials, landscaping and operation, should minimise the effects of overheating as well as

minimise energy consumption.

- 6.1.55. Local Plan Policy LP 22 furthers this and sets out developments will be required to achieve the highest standards of sustainable design and construction to mitigate the likely effects of climate change. This policy further sets out that developers are required to incorporate measures to improve energy conservation and efficiency as well as contributions to renewable and low carbon energy generation.
- 6.1.56. An Energy and Sustainability Statement (including BREEAM Domestic Refurbishment Pre-Assessment) has been prepared by XCO2 and supports the application.
- 6.1.57. The Statement concludes that the reduction in CO2 emissions on site are estimated at 86.79% over the existing building baseline assessment which has been modelled in line with Part L 2021. The development has been reduced against an existing building baseline assessment through on-site measures alone by 13.21% (0.46 tonnes per annum).
- 6.1.58. This has been achieved through the following key sustainability features:
- The improvement in fabric efficiency through additional internal insulation to the roof and refurbishment of the external walls;
 - Upgrades to a more efficient, all electric space and water heating system;
 - The specification of water efficient fittings to limit water consumption to less than 105 litres per person per day; and
 - The development is not expected to have any significant adverse effects to air, noise, land, or watercourses.
- 6.1.59. The BREEAM Domestic Refurbishment Pre-Assessment concludes that the scheme achieves a score of 71.66% corresponding to a rating of 'Excellent'.
- 6.1.60. A Sustainable Construction Checklist supports the application. This demonstrates that the scheme will achieve a score of 47.
- 6.1.61. Overall, the proposed development complies with Local Plan Policy LP 20, LP 22, London Plan Policy SI 2 and the NPPF.

Fire

- 6.1.62. London Plan Policy D12 sets out that all development proposals must achieve the highest standards of fire safety.
- 6.1.63. A Fire Safety Strategy has been prepared by Fire Safety London, which demonstrates compliance with the criteria in London Plan Policy D12 part A.

Flood risk

- 6.1.64. Local Plan Policy LP 21 sets out that all development should avoid, or minimise, contributing to all sources of flooding and that development will be guided to areas of lower risk.
- 6.1.65. The application site is located within Flood Zone 1, which has the lowest probability of flooding as it has been assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%). In addition, the application site has a very low risk of surface water flooding. Furthermore, the site has a very low risk of sewers and groundwater flooding and there is no risk of infrastructure failing flooding.
- 6.1.66. The proposed scheme seeks to convert the existing building and as such, the proposals would not result in any additional impermeable areas being built. There has been no recent

history of surface water flooding at the site and therefore this should be considered acceptable and will not increase the risk of flooding.

- 6.1.67. Therefore, the proposed development will not result in an increase in flood risk and therefore, the proposed development complies with Local Plan Policy LP 21.

Land contamination

- 6.1.68. Local Plan Policy LP10 sets out that Council will seek to ensure that local environmental impacts of all development proposals do not lead to detrimental effects on the health, safety and the amenity of existing and new users or occupiers of the development site, or the surrounding land. This policy further sets out that the Council promotes, where necessary, the remediation of contaminated land where development comes forward.
- 6.1.69. Historically, the building has not been used for heavy industrial processes. Furthermore, there will be no ground intrusive works associated with the proposed application. Therefore, the site is suitable for the proposed use without risk to human health.
- 6.1.70. As such, the proposed scheme complies with Local Plan Policy LP10.

Affordable housing

- 6.1.71. Local Plan Policy LP 36 sets out that a contribution towards affordable housing will be expected on all housing sites.
- 6.1.72. Policy LPD 36 further sets out that where a reduction to an affordable housing contribution is sought from the requirements on economic viability grounds, developers should provide a development appraisal to demonstrate that schemes are maximising affordable housing.
- 6.1.73. The table below sets out the required affordable housing contribution amount for a scheme relating to a change of use of a former employment site for residential use, as set out in Richmond's Affordable Housing SPD (2014).

No of units replacing employment floorspace	% of Affordable Housing	No of AH Homes
9 units	90%	8.1
8 units	80%	6.4
7 units	70%	4.9
6 units	60%	3.6
5 units	50%	2.5
4 units	40%	1.6
3 units	30%	0.9
2 units	20%	0.4
1 unit	10%	0.1

Table 2. Affordable housing requirement set out in the Affordable Housing SPD (2014)

- 6.1.74. Policy LP 36 and the Affordable Housing SPD suggests that the Council will require a payment in lieu which is the equivalent of an affordable housing provision of 20% of the residential dwellings – i.e. $2 \times 20\% = 0.4$ units.
- 6.1.75. The Council's calculation of payment in lieu is based upon a spreadsheet prepared by Bespoke Property Group (Appendix 1). Using the default assumptions provided within the spreadsheet and subject to agreement of other site-specific viability assumptions, we estimate a commuted sum requirement of **£229,630**.
- 6.1.76. A Financial Viability Assessment has been prepared by Grimshaw Consulting Limited and supports this application.
- 6.1.77. This Assessment confirms that there is deficit position of **(-£2,054)** and the financial appraisal demonstrates that the proposed development cannot support a payment in lieu of on-site affordable housing.
- 6.1.78. Therefore, the proposed development complies with Local Plan Policy LP 36.

7. Heritage Considerations

- 7.1.1. Section 72(1) of Planning (Listed Building and Conservation Areas) Act 1990 relates to planning decisions for development within conservation areas and sets out special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.
- 7.1.2. London Plan Policy HC1 states that proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.
- 7.1.3. Local Plan Policy LP3 furthers this and sets out 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. This policy further adds that 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.

- 7.1.4. Paragraph 208 of the NPPF (2023) states the following:

“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”.

- 7.1.5. The site is located within the Twickenham Riverside Conservation Area.
- 7.1.6. The Conservation Area is situated on the Middlesex bank of the River Thames and spans from Marble Hill Park in the east to Radnor Gardens at its western boundary, with the A305/A310 forming most of its northern boundary. To the south, the Conservation Area extends south into the Thames to include Eel Pie Island, which is physically connected via a narrow footbridge.
- 7.1.7. The Twickenham Riverside Conservation Area Appraisal notes that brick is the predominant building material, with stock and gault brick generally employed for residential use and red brick for commercial buildings.
- 7.1.8. The Conservation Area Appraisal (CAA) sets out that Orleans Road (as well as Montpelier Row) have their own townscape character. The CAA describes Orleans Road as the following:

“The road is distinguished by its colourful cottages and former works buildings, narrow pedestrian space, and quaint village appearance. There are a variety of building materials and styles, with brick, render, timber all common. The intimacy of this former mews is emphasised by the buildings which rise directly from the pavement, though there are occasional front gardens which are well landscaped, adding visual interest, contributing to the village character, and interrupting the building line to avoid feeling too enclosed. Generally, buildings within the northern section of the road are more tight knit, terraced or adjoining buildings, whereas buildings to the south are set in wider gardens, transitioning to the more open character of the parkland beyond.”

- 7.1.9. The site is specifically referenced in the CAA and is described as the following:

“No. 10 is an old storage building with a gable roof that imitates the form and scale of the chapel, creating a harmony in appearance.”

- 7.1.10. The proposed scheme has been carefully designed to enhance the character of the Conservation Area. The scheme seeks to retain original features such as the pitched gabled roof and the existing brick façade which is recognised as a prominent building material within the Conservation Area. Therefore, the building will continue to imitate the form and scale of the chapel and continue to create a harmony in appearance.
- 7.1.11. The scheme proposes external alterations that are sympathetic to the existing building. The new dormer windows have been reduced in size following the Pre-Application advice received and have been carefully designed to appear subservient to the existing building and respect the surrounding context. The roof dormers are designed to relate in terms of rhythm and proportion of the older Gothic style window at The Old Chapel building opposite the site, west of Orleans Road. The building will continue to sit comfortably lower than the neighbouring properties along Chapel Road The Old Chapel and so is compatible in terms of scale and massing.
- 7.1.12. The proposed scheme has considerably greater architectural merit than the existing building and resonates well with The Old Chapel and the adjoining terraces along Chapel Road. Given the sites prevalent visibility along Orleans Road, the design responds intelligently to the heritage sensitivities of the surroundings and would contribute positively to local views and character and appearance of the conservation area as a whole.
- 7.1.13. Orleans Road has a 'quaint village appearance' as described in the CAA and therefore, bringing a vacant building back into a vibrant and active use would positively add to the quality of the local area and improves the character of the Conservation Area.
- 7.1.14. The proposed scheme is regarded as betterment compared to the existing building in heritage terms and would meet the NPPF objective for achieving sustainable development. The scheme will create a notable enhancement to the conservation area.
- 7.1.15. In our view, the proposed scheme will not lead to less substantial harm to the significance of the Twickenham Riverside Conservation Area. However, should the LPA consider that the scheme does cause less than substantial harm, there are clear public benefits which greatly outweigh any harm and these are summarised in Section 8 of this Planning and Heritage Statement.
- 7.1.16. As such, the proposed development complies with, London Plan Policy HC3, Local Plan Policy LP3 and the NPPF.

8. Conclusions

- 8.1.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires proposals for new development to be determined in accordance with the development plan unless material considerations indicate otherwise. The Planning and Heritage Statement has addressed relevant planning and heritage considerations and provided evidence to help determine this application.
- 8.1.2. The scheme delivers the following planning benefits:
- Conversion of a tired, dated and vacant former employment building with two new family homes contributing to much needed housing in the area;.
 - Delivering a high quality design that responds positively to Development Plan Policies and enhances the Twickenham Riverside Conservation Area;
 - Promotes an efficient use of land in a sustainable location
 - 86.79% reductions in CO2 emissions;
 - BREEAM Domestic Refurbishment Pre-Assessment score of 71.66% corresponding to a rating of 'Excellent';
 - Promoting sustainable modes of travel through provision of on-site cycle parking spaces;
 - The provision of new homes would generate Council Tax receipts for Richmond; and
 - Creation of new jobs through the construction phase.
- 8.1.3. This is a substantial list of planning benefits and the proposal is entirely appropriate for the site and its surrounding location. The proposal is compliant with both national and all relevant policies of the Development Plan. As such, the presumption in favour of sustainable development should be applied and the scheme therefore fully justifies the grant of planning permission.

Appendix 1

Appendix

A Drawing List

Drawing Number	Drawing Title	Scale	Rev
22001_P001	LOCATION PLAN	1:1250	P1
22001_P002	EXISTING SITE PLAN	1:100	P1
22001_P003	PROPOSED SITE PLAN	1:100	P1
22001_E100_EX	EXISTING ELEVATION ORLEANS RD	1:50	P1
22001_E101_EX	EXISTING ELEVATION CHAPEL RD	1:50	P1
22001_E102_EX	EXISTING ELEVATION SOUTH	1:50	P1
22001_E103_EX	EXISTING ELEVATION EAST	1:50	P1
22001_P100_EX	EXISTING GROUND FLOOR PLAN	1:50	P1
22001_P101_EX	EXISTING FIRST FLOOR PLAN	1:50	P1
22001_P102_EX	EXISTING ROOF PLAN	1:50	P1
22001_S100_EX	EXISTING SECTION AA	1:50	P1
22001_E100	PROPOSED ELEVATION ORLEANS RD	1:50	P1
22001_E101	PROPOSED ELEVATION CHAPEL RD	1:50	P1
22001_E102	PROPOSED ELEVATION SOUTH	1:50	P1
22001_E103	PROPOSED ELEVATION EAST	1:50	P1
22001_P100	PROPOSED GROUND FLOOR PLAN	1:50	P1
22001_P101	PROPOSED FIRST FLOOR PLAN	1:50	P1
22001_P102	PROPOSED ROOF PLAN	1:50	P1
22001_S100	PROPOSED SECTION AA	1:50	P1
22001_S101	PROPOSED SECTION BB	1:50	P1

Appendix 2

**Environment Directorate
PLANNING**

Civic Centre
44 York Street
Twickenham
TW1 3BZ
website: www.richmond.gov.uk

Our ref: 22/P0192/PREAPP

Contact: Kerry McLaughlin
Telephone: 02088911411

Email: Kerry.McLaughlin@richmondandwandsworth.gov.uk

Ben Clark
ben@clarkandclark.co.uk

06 September 2022

BY EMAIL ONLY

Dear Ben Clark,

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)

**LOCATION: 10 ORLEANS ROAD, TWICKENHAM, TW1 3BL
PROPOSAL: CONVERSION OF EXISTING BUILDING TO 2 RESIDENTIAL HOMES.**

I write in reference to your request for pre-application advice.

Site Description

The application property is a 1.5 storey building, located on the junction of Orleans Road and Chapel Road.

Records indicate the site was formerly used for warehouse/storage purposes.

The site is subject to the following planning constraints:

Archaeological Priority (English Heritage)	Site: Twickenham and Marble Hill - Early Medieval settlement first mentioned in an early 8th century Saxon charter. Twickenham became
Article 4 Direction Basements	Article 4 Direction - Basements / Ref: ART4/BASEMENTS / Effective from: 18/04/2018
Conservation Area	CA8 Twickenham Riverside
Protected View (Indicative Zone)	N_View_004 View from near Ham House to Orleans House
Protected View (Indicative Zone)	N_View_005 View to Marble Hill House (north)
Throughflow Catchment Area (Throughflow and Groundwater Policy Zone)	Adopted: October 2020 , Contact: Local Plan Team
Throughflow Catchment Area (Throughflow and Groundwater Policy Zone)	Adopted: October 2020 , Contact: Local Plan Team
Village	St Margarets and East Twickenham Village
Ward	Twickenham Riverside Ward

Planning History

There is no relevant planning history associated with this site.

Relevant Policies

All Local Plan policies and Supplementary Guidance and Documents are available to view on the Council's website www.richmond.gov.uk. Consideration must also be given to policies in the London Plan and National Planning Policy Statements. Relevant local policies are summarised below (not exhaustive):

Adopted Local Plan (July 2018)

- LP 1 - Local Character and Design Quality
- LP 3 - Designated Heritage Assets
- LP 8 - Amenity and Living Conditions
- LP 16 - Trees, Woodland and Landscape
- LP 10 - Local Environmental Impacts, Pollution and Land Contamination
- LP 20 - Climate Change Adaptation
- LP 22 - Sustainable Design and Construction
- LP24 - Waste Management
- LP 34 - New Housing
- LP35 - Housing Mix & standards
- LP 36 - Affordable Housing
- LP 42 - Industrial Land and Business Parks
- LP 44 - Sustainable Travel Choices
- LP 45 - Parking Standards and Servicing

Supplementary Guidance

- Residential Development Standards (incorporating Nationally Described Space Standards)
- Small and Medium Housing Sites
- Affordable Housing
- Design Quality
- Planning Obligation Strategy
- Refuse and Recycling Storage Requirements
- Residential Development Standards
- Sustainable Construction Checklist
- Transport
- Conservation Area CA8 Twickenham Riverside Study and Statement
- St Margarets and East Twickenham Planning Guidance SPD

Principle of Development

The proposal seeks to change the use of the currently vacant warehouse (B8 use) at 10 Orleans Road, by splitting it into two self-contained residential dwellings (C3 use).

Policy LP42 of the Local Plan states "*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.*"

Retention of industrial space

A. There is a presumption against loss of industrial land in all parts of the borough.

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:*
 - a. *Redevelopment for office or alternative employment uses.*

b. 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”

As such there is an in-principle objection for the change of use from industrial use of the premises to residential. The pre-application is not accompanied with any supporting information as outlined under 1 & 2. If, against council advice, the applicant wishes to proceed with a formal planning application for this scheme robust evidence demonstrating the above has been undertaken and is unviable will be required. The applicant will be required to provide marketing evidence and undertake a sequential test.

Housing Standards

Housing mix

Policy LP35 (A) states that the unit mix should be appropriate to the location. Development should generally provide family sized accommodation, except within town centres or Areas of Mixed Use where a higher proportion of small units would be appropriate. The Borough SHMA supports this approach, finding that an overall mix of market housing should be delivered, including family housing and options for older households to downsize.

Due to the site's location outside of a town centre, the development should provide family sized accommodation. No information has been provided regarding how many bedrooms/people the properties will accommodate. This information will need to be clearly demonstrated in any formal submission.

Internal Space Standards

Policy LP35 requires that all new housing complies with the Nationally Described Space Standards (NDSS). The minimum standards are outlined below:

- A double bedroom should be 11.5sqm and 2.75m wide
- Head height should be at least 2.3m for a minimum of 75% of the gross internal floor (GIA) area (However please note the London Plan requires a minimum head height of 2.5m for new dwellings within London to mitigate the 'heat island' effect)
- Suitable storage space to be incorporated into units

Table 1 - Minimum gross internal floor areas and storage (m²)

Number of bedrooms(b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) *			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	

No plans or measurements have been provided, any scheme will need to ensure the above standards are met.

You are also recommended to provide a sectional drawing to demonstrate that the unit is provided with at least 2.5m head height for at least 75% of the floor space (as per NDSS requirements in London).

Non-compliance with the minimum standards will not be accepted.

Potential concern with regards to impact on obscured glazed and restricted opening windows on the upper floors to the quality of the accommodation.

External Amenity Space

The requirements of Policy LP35 and the Residential Development Standards SPD continue to apply to external amenity space. Sufficient on-site outdoor amenity space must be provided in new residential developments. To provide adequate private amenity space, 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.

Policy LP35 states that amenity spaces should be:

- a. private, usable, functional and safe;
- b. easily accessible from living areas;
- c. orientated to take account of need for sunlight and shading;
- d. of a sufficient size to meet the needs of the likely number of occupiers; and
- e. accommodation likely to be occupied by families with young children should have direct and easy access to adequate private amenity space.

Submitted drawings show the provision of balcony however given potential design concerns, there may not be scope to include any private amenity space as part of future proposals.

Further information on proximity and accessibility to public open space will be required in the event that private amenity space cannot be provided on site.

Inclusive Access Policy

LP35 (E) requires all new build housing is required to meet Building Regulation Requirement M4 (2) 'accessible and adaptable dwellings'. This requirement is also reflected in London Plan Policy D7. The Building Regulations M4 (2) and M4 (3) require step free access. In non-lift serviced multi-storey development where step free access is not viable, assessments should be submitted to demonstrate that the inclusion of a lift would make the scheme unviable or mean that service charges are not affordable for intended residents. If this is satisfactorily evidenced, then the units above or below the ground floor that cannot provide step free access would only need to satisfy the requirements of M4(1) of the Building Regulations.

Part M4 (3) of the Building Regulations regarding 'wheelchair user dwellings' distinguishes between 'wheelchair accessible' (a home readily useable by a wheelchair user at the point of completion) and 'wheelchair adaptable' (a home that can be easily adapted to meet the needs of a household including wheelchair users). M4 (3) wheelchair 'accessible' should only be applied where the local authority is responsible for allocating or nominating a person to live in that dwelling.

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'.

Design

Policy LP 1 of the Local Plan outlines that the Council will require all development to be of high architectural and urban design quality. The high-quality character and heritage of the borough and its villages will need to be maintained and enhanced where opportunities arise. Development 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.

Policy LP3 of the Local Plan 2018 covers Designated Heritage Asset and states that proposals should conserve and take opportunity to make positive contribution to the historic environment such as retaining and preserving the original structure, layout, architectural features and materials or

reinstatement of heritage assets.

Appropriate materials and techniques should be used. There is a requirement to seek to avoid harm or justify for loss and demolition will be resisted. The significance of the asset is taken into consideration when assessing works proposed to a designated heritage asset.

Background and Significance

This single storey building with its simple architectural features dates from the latter part of the 19th century. It lies within the Twickenham Riverside Conservation Area no.8. It is marked on current maps as a works building (formerly a garage) but may have originally been a school (as indicated on the 1895-98 county survey).

The building would have formed part of the 19th and early 20th century small-scale residential enclave between Marble Hill, Montpelier Row, Orleans House, Sion Row and York House, which included a mix of uses including a pub, chapel, workshops and mews, as well as the gate houses to Southend House and Orleans House, and gardeners cottage to Orleans House. Lebanon Park was also in close proximity. The historical significance of Orleans Rd and its buildings therefore lie in their connection to the larger surrounding houses and estates

The building is situated directly onto the pavement on the corner of Orleans and Chapel Roads and is built of mixed stock bricks with red brick band detail, quoins and window heads. It has a simple pitched tiled roof with an end gable and raised parapet facing Chapel Road. The façade facing Chapel Road has a single double casement on the ground floor with a smaller window above, with three similar windows and an entrance with fanlight on Orleans Road.

Although simple in design and construction, its architectural significance lies in its contributing towards the cohesive quality and scale of the buildings in the road.

The east elevation is not visible as it directly adjoins a row of double storey cottages on Chapel Road. The south side is visible from Orleans Road but currently covered in creeper. It has two apparent later addition windows within the gable.

It directly adjoins, but is set forward of, a row of cottages on Orleans Road which are BTMs. The listed curtilage outbuilding to grade II* listed 15 Montpelier Row is situated directly on the opposite corner to the site. <https://historicengland.org.uk/listing/the-list/list-entry/1285639?section=official-list-entry>

Proposal

The current proposal is to convert the existing building to two residential homes with additional accommodation in the roof.

Assessment

It is proposed to split the building in half to form two dwellings. A new entrance would have to be formed for one of the units where there is currently a window, the window in the end gable facing Chapel Road would be enlarged and 4 front half dormers would be added - two for each house. It also appears that the roof would be lifted to create more head-height for the upper floor.

The existing building is not large, it would therefore be preferable as a single unit as the changes required to form two would destroy far too much of the original character and fabric of the building. To create two units the proportions would be altered to lift the roof resulting in an unbalanced façade and odd roofline with a loss of the tiles, the gables would be lost, there are also too many dormers which are excessive in scale and dominant/visible, the design and proportion of the original timber casement fenestration would be lost to windows of a reduced size and poor design, a window would be lost to a front door of an inappropriate design, and the smaller gable window on the Chapel Road elevation would be converted to a French door which is too large with a balcony which overhangs the pavement in a very narrow road.

The combined proposed changes would largely destroy the character and proportions of the building and would not be sympathetic to the overall character of the conservation area, noting also the building's proximity to a number of BTMs and listed building. The proposals would therefore be harmful to both the character of the building and the wider CA.

Conclusion

Paragraph 202 of the NPPF states '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'. In this instance, whilst the proposal would lead to less than substantial harm to the significance, character and appearance of the conservation area, there is no public benefit arising from the proposal as such it is contrary to the NPPF.

The scheme would result in a much altered building and the loss of original features and proportions. This in turn would have a harmful visual impact on the conservation area in Orleans and Chapel Roads, and a harmful impact on the setting of the studio building to the rear of 15 Montpelier Row.

In accordance with paragraph 203 of the NPPF 2021 the effect of an application on the significance of the non-designated heritage assets should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

The alteration of the building within the CA would also have a harmful impact on the neighbouring cottages at 12-24 Orleans Road which are BTMs. As these are set back and no.10 faces directly onto the road, the impact of the proposals for the latter will be very visible against the backdrop of these BTMs, as well as with no.31 on the opposite side of the road (which is also a BTM and retains much of its original façade) when seen in direct views with no.10 when looking down Orleans Road.

These proposals for splitting the building into two units with the external changes shown would therefore result in harm to the significance of the building as well as the conservation area, as well as the setting of surrounding designated and non-designated heritage assets.

It would therefore be preferable if the building were to remain as a single unit. External alterations to the building should be kept to a minimum.

Note, there appears to be no proposed south elevation of the building with the submission.

Recommendation

It is not recommended that the current proposals are taken forward to a full planning submission until changes to the exterior of the building are reduced to a minimum.

The use of dormer windows should be avoided, the roof should not be lifted, the windows should be retained in their current form and size, a new front door opening should be avoided, and a large opening and balcony should not be added to the side elevation.

Neighbouring Residential Amenity

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

Given the proposed use and scale and nature of the external alterations it is not envisaged that any concerns regarding neighbour amenity impact will arise, however this is subject to full details being provided.

However, all new upper floor windows will be expected to be obscure glazed and non-openable below 1.7m when measured from the floor of the room it serves.

Sustainability

On the basis that information in relation to the sustainability performance of the development has not been provided as part of this pre-application, the Council are unable to establish if the proposed development would accord with policies LP 20 and LP 22 of the Local Plan.

The applicant is advised that should the proposed development be considered acceptable; the scheme would be required to comply with the following:

- Conform to the Sustainable Construction Checklist SPG, with the development achieving a satisfactory Sustainable Construction Checklist score.
- Achieve water consumption targets of 105 litres or less per person per day, and 5 litres or less per head per day for external water use.
- Be connected to a decentralised energy network (where feasible).
- Meet the BREEAM domestic refurbishment pre-assessment 'Excellent' standard.

You are advised that a subsequent application would need to be accompanied with a completed Sustainable Construction Checklist, Water Usage Statement and BREEAM Domestic Refurbishment Pre-Assessment to demonstrate compliance with the above. Should the proposal fail to comply with the above standards then evidence would need to be provided to justify departure from these sustainability requirements.

Transport

Policy LP44 of the Local Plan states 'The Council will work 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.'

Policy LP 45 'Parking Standards and Servicing' outlines that the Council will require new development to make provision for the accommodation of vehicles in order to provide for the needs of the development while minimising the impact of car based travel including on the operation of the road network and local environment, and ensuring making the best use of land.'

Limited information has been submitted along with this application, no details have been provided regarding the potential number of bedrooms, persons, or parking.

The site has a PTAL score of 3. London Plan (2021) policy T6 requires either 0.75 or 1 parking space per dwelling.

Location	Number of beds	Maximum parking provision*
Outer London PTAL 4	1 – 2	Up to 0.5 - 0.75 spaces per dwelling+
Outer London PTAL 4	3+	Up to 0.5 - 0.75 spaces per dwelling+
Outer London PTAL 2 – 3	1 – 2	Up to 0.75 spaces per dwelling
Outer London PTAL 2 – 3	3+	Up to 1 space per dwelling
Outer London PTAL 0 – 1	1 – 2	Up to 1.5 space per dwelling
Outer London PTAL 0 – 1	3+	Up to 1.5 spaces per dwelling^

It appears there would be no space for vehicles on the site as such council will require the applicant to enter into a S106 legal agreement preventing occupiers of the properties from obtaining residents parking permits. In addition, a minimum of two, secure, covered cycle spaces will be required per dwelling, in accordance with LP2021 policy T5 A transport statement should encompass the above.

In order to demonstrate the development would not have an unacceptable impact on the public highway and neighbours, the applicant must submit a detailed Construction Management Plan for the project, using the LBRuT pro-forma document, available here https://www.richmond.gov.uk/media/22165/construction_management_plan_guidance_notes.pdf

This should demonstrate how the works are to be carried out, including but not limited to: The number, type and dimensions of vehicles that will be required, routing, methods of spoil removal and concrete supply, protection for other highway users and vulnerable pedestrians, the position of vehicles, skips, etc. Site setup drawings at a minimum scale of 1:200 are required showing the site in context of the surroundings.

The applicant is advised to engage an experienced transport consultant to assist

Waste

In the absence of any suitable external space at the front to store waste it would have to be stored internally in suitably ventilated and vermin-proof cupboards.

For SPD compliance, each internal cupboard should provide suitable space for 240 litres of refuse plus 2 x 55 litre recycling boxes plus 1 x 23 litre food waste container. However, it is noted 240 litres refuse per week is somewhat excessive, with many councils now collecting a single 180 litre refuse bin fortnightly. The equivalent requirement would be for each cupboard to provide 400 litres storage in total incl. a nominal 150 litres refuse.

There is an established precedent in the immediate vicinity with households without front gardens having to present waste sacks for collection on-street, so that practice may be acceptable here too. Notwithstanding this, if bin cupboards were recessed into the front of the building & accessible from the street, that would be a preferable solution which would avoid adding to on-street waste in the area.

There is a potential issue here with rigid recycling containers placed on-street. Suitable provision for the separate storage of recycling streams in the kitchens should be provided.

Affordable Housing

Local Plan Policy LP36 states that some form of affordable housing contribution will be expected on all new housing sites. This policy sets out the framework which requires contributions to affordable housing from all small sites. As set out in the Affordable Housing SPD "The affordable housing provision (on-site or off-site) or any financial contribution should be calculated in relation to gross rather than net development i.e. it should be based on the total number of units proposed in the final development."

The financial contribution that would be sought would be 8% on 2 units

Where a reduction to an affordable housing contribution is sought on economic viability grounds, developers should provide a development appraisal to demonstrate the viability of the scheme.

The developer will be required to underwrite the costs of a Council commissioned economic viability assessment.

The contribution would be secured through a s106 legal agreement.

Trees and Ecology

Policy LP16 of the Local Plan states '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.'

Trees within this site and those adjacent are protected by the Twickenham conservation area.

In this instance there are no trees that will be affected by the proposal and therefore no objection is likely to arise.

There is a prominent and well-established vine (possibly a trumpet vine (*Campsis radicans*) growing on the southern wall of the existing building. Council considers this an attractive covering of an otherwise fairly imposing wall, especially for the neighbours at 12/14 Orleans Road. Unfortunately, there is no legislation that can safe guard the vine. However, council encourage its careful retention during and after works as it does add greenery to the conservation area.

Other Matters

Fire Safety

Upon any formal planning application, the applicant must submit the following documentation in order to comply with the requirements as set out under Policy D12 Of the London Plan (2021):

- Information confirming compliance with the following requirements:
 - 1) *identify suitably positioned unobstructed outside space: a) for fire appliances to be positioned on b) appropriate for use as an evacuation assembly point*
 - 2) *are designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire; including appropriate fire alarm systems and passive and active fire safety measures*
 - 3) *are constructed in an appropriate way to minimise the risk of fire spread*
 - 4) *provide suitable and convenient means of escape, and associated evacuation strategy for all building users*
 - 5) *develop a robust strategy for evacuation which can be periodically updated and published, and which all building users can have confidence in*
 - 6) *provide suitable access and equipment for firefighting which is appropriate for the size and use of the development.*
- A site plan demonstrating that space has been identified for the appropriate positioning of fire appliances. These spaces are to be kept clear of obstructions and conflicting uses which could result in the space not being available for its intended use in the future.
- A site plan showing appropriate evacuation assembly points.

Validation Checklist

Upon submission of any future application in relation to this proposal, the following documents will be required:

- Completed full planning application form
- Completed CIL form, for further guidance please view the links below.
http://www.planningportal.gov.uk/uploads/1app/forms/cil_questions.pdf
http://www.planningportal.gov.uk/uploads/1app/cil_guidance.pdf
- Fee
- Marketing Evidence
- Heritage Statement
- Design and Access Statement
- Fire Safety Statement
- Affordable Housing pro-forma Annex A
- Transport Statement
- Construction Management Plan
- Details of Cycle Parking & Refuse
- Sustainable Construction Checklist
- Water Usage Statement
- BREEAM Pre-Assessment
- A site location plan to a scale of 1:1250 with the boundary of the site outlined in red. For further guidance please view the links below.
<http://www.planningportal.gov.uk/planning/applications/plans>
http://www.planningportal.gov.uk/uploads/1app/maps_plans_and_planning_apps.pdf
- Existing and proposed floor plans and elevations. Please note: All drawings must be to scale (at 1:100 or 1:50) and include a scale bar.

Applicants are advised to refer to the national list of requirements and the Council's Local Validation Checklist before submitting a full application - http://www.richmond.gov.uk/home/services/planning/make_a_planning_application.htm

Summary

There is an in-principle objection to the change of use from industrial use of the premises to residential. The proposal is contrary to LP42 of the Local Plan which specifically states "There is a presumption against loss of industrial land in all parts of the borough." You are advised against submitting a formal planning application for the scheme as proposed here, and seek alternative uses as outlined in policy LP42.

Furthermore, works to the exterior of the building should be kept to a minimum. The use of dormer windows should be avoided, the roof should not be lifted, the windows should be retained in their current form and size, a new front door opening should be avoided, and a large opening and balcony should not be added to the side elevation.

As advised on the Council's website, with the issuing of this letter, this pre-application case is now deemed closed. Any further advice sought from officers will either be charged at the hourly rates as outlined on the Council's website or the full pre-application fee, as deemed appropriate by the Local Planning Authority. [Pre-application advice for householders, developers and businesses - London Borough of Richmond upon Thames](#)

Without prejudice

Any given advice by Council Officers from pre-application enquiries does not constitute a formal response or decision of the Council with regard to future planning consents. Any views or opinions expressed are given in good faith and to the best of ability without prejudice to formal consideration of any planning application, which was subject to public consultation and ultimately decided by the Council. You should therefore be aware that officers cannot give guarantees about the final form or decision that will be made on your planning or related applications.

Although the advice note will be brought to the attention of the Planning Committee or an officer acting under delegated powers, it cannot be guaranteed that it will be followed in the determination of future related planning applications and in any event circumstances may change or come to light that could alter the position. It should be noted that if there has been a material change in circumstances or new information has come to light after the date of the advice being issued then less weight may be given to the content of the Council's pre-application advice of schemes. You are also advised to refer to local and national validation checklist on the Council's website.

As advised on the Council's website, with the issuing of this letter, this pre-application case is now deemed closed. Any further advice sought from officers will either be charged at the hourly rates as outlined on the Council's website or the full pre-application fee, as deemed appropriate by the Local Planning Authority. [Pre-application advice for householders, developers and businesses - London Borough of Richmond upon Thames.](#)

Yours sincerely



pp
Nicki Dale

Team Manager - South Area

Development Management

London Borough of Richmond Upon Thames



Appendix 3

Dear Neighbour,

My family have owned 10 Orleans Road for X years and as you know it has been empty now for some time whilst we carefully consider how it could be re-used. We have considered returning the building to its previous commercial use (light industrial/storage) or conversion into two homes. We would like to let you know how we propose to take this forward before we apply for planning permission and answer any questions you might have.



Our proposal seeks to sensitively convert the property into 2 x two-bedroom homes. Key elements of the design approach have ensured that the proposed development is of highest quality for both future residents and the local community, without comprising the character of the Twickenham Riverside Conservation Area.

There will be minimal changes to the exterior of the building, with the addition of dormers at the front and windows in the gable end and rooflights. These have been designed to be sympathetic to the building, the Conservation Area and privacy of our neighbours by minimising overlooking.

The vision and design rationale of the proposed development is to create two high quality new homes. The quality of the design and the attractive living environment it creates would lead to a cohesive environment for the Orleans Road street-scene, a quiet residential street. The architectural language of the proposed detailing has been heavily influenced by the surrounding context, rich with texture.

The proposal has been carefully designed to ensure that there will be no material impacts on noise and disturbance to surrounding neighbouring residents. The proposal will be 'car-free' and will include cycle parking spaces to promote sustainable transport modes.

It is anticipated that the planning application will be submitted to Richmond Council by the end of November. For more information or if you have any queries about the proposals, please get in touch.

Email – jaquivalent@hotmail.com
Telephone – +44 (0)7720 892 547

