



PLANNING STATEMENT

In respect of

74 OLDFIELD ROAD, HAMPTON, TW12 2HR

On behalf of

SHURGARD UK LTD

QUALITY MANAGEMENT

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Table of Contents

1. EXECUTIVE SUMMARY	4
2. INTRODUCTION	6
3. APPLICATION SITE AND CONTEXT	8
4. RELEVANT PLANNING HISTORY	11
5. PROPOSED DEVELOPMENT	13
6. PLANNING POLICY CONTEXT	15
7. PLANNING ASSESSMENT	18
8. ECONOMIC BENEFITS.....	35
9. PLANNING OBLIGATIONS STATEMENT (DRAFT HEADS OF TERMS).....	42
10. CONCLUSION.....	43

Relevant Figures and Tables:

Figure 1: Adjacent Waitrose Supermarket	8
Figure 2 Adjacent Ryedale Court	9
Figure 3: Proposed south elevation (front – Oldfield Road)	14
Figure 4: Proposed north elevation (railways).....	14
Figure 5 Extract from interactive Policies Map showing LP 42 Industrial Land Business Park	19
Figure 6 Norther elevation (Railway Line)	25
Figure 7 Side Elevation	25
Figure 8 Contextual southern elevation (Oldfield Road) with planting	25
Figure 9: Shurgard data.....	40
Table 1 Proposed floorspace.....	6
Table 2: Relevant Planning History	11
Table 3: Proposed development.....	13
Table 4:Existing non-ancillary office floorspace	22

1. EXECUTIVE SUMMARY

1.1 This Planning Statement has been prepared on behalf of Shurgard UK Ltd ('the applicant'), in support of a full planning application for the redevelopment of 74 Oldfield Road, Hampton, TW12 2HR ('the Site').

1.2 The applicant seeks planning permission for the following development works ('the proposal').

“Demolition and redevelopment of the site to provide self-storage unit (Use Class B8) and business centre (Use Class E (g)(i)) with associated car and cycle parking, and landscaping.”

Planning Benefits

1.3 The proposed development is justified on the following grounds:

- Delivery of a minimum of 5,434 sqm and a maximum of 8,084 sqm of employment floorspace;
- Provision of 170 sqm Business Centre (Use Class E (g)(i)) representing an uplift of 97.8 sqm;
- The equivalent of 50-66 jobs, representing an uplift of 28-34 employment opportunities;
- Enhanced building design including Secured by Design and a low carbon development/ high energy efficiency;
- Creating and maintaining attractive, distinctive places; the scheme provides a high quality and sustainably constructed redevelopment proposal which would enhance the existing townscape;
- Respect the amenity of neighbouring residents;
- Tackling and adapting to climate change; the scheme seeks to enlist sustainable principles through construction and design whilst promoting ecological and green infrastructure enhancement on site;
- Provide appropriate levels of car and cycle parking and promote sustainable transport within the area; and
- Local CIL contributions and site specific S106.

1.4 Various aspects of the scheme are assessed against national guidance and the development plan. This statement demonstrates that in addition to the planning benefits outlined above, compliance with the development plan is achieved. Where material considerations indicate otherwise these are referenced, in accordance with S38C of the Planning and Compulsory Purchase Act 2004.

1.5 A material increase in employment floorspace and capacity is delivered through the proposal and within a building envelope that reflects the character of the area, in compliance with Policy LP 1 in particular.

- 1.6 Other aspects of the proposal demonstrate compliance with the development plan, in particular: -
- a. Biodiversity Net Gain
 - b. Energy and Sustainability
 - c. Highways and servicing
 - d. Accessibility
 - e. Fire Safety; and
 - f. Sustainable drainage.
- 1.7 Overall, the proposed development represents a form of sustainable development that would make an effective use of an underutilised employment site, in accordance with relevant national and local planning policies.

2. INTRODUCTION

- 2.1 This Planning Statement has been prepared on behalf of Shurgard UK Limited ('the Applicant'), in support of a full planning application for the redevelopment of 74 Oldfield Road, Hampton, TW12 2HR ('the Site').
- 2.2 The Site is located within London Borough ('LB') Richmond upon Thames ('Richmond').
- 2.3 The Applicant seeks full planning permission for the following development works ('the Proposed Development'):

“Demolition and redevelopment of the site to provide self-storage unit (Use Class B8) and business centre (Use Class E (g)(i)) with associated car and cycle parking, and landscaping.”

- 2.4 The proposal will provide a new residential use on the Site comprising the following:

Use	Use Class	Floorspace (sqm GIA)
Self-storage	Class B8	5,264
Business Centre/ office	Class E (g)(i)	170
Total		5,434

Table 1: Proposed floorspace

- 2.5 The development has the potential to deliver an additional 2,650 sqm of B8 floorspace through mezzanine floorspace.
- 2.6 The proposed development has been subject to pre-application engagement with the Council in November 2023 and February 2024. Further information regarding these discussions is provide in section 4 of this Planning Statement.

Planning Application Submission

- 2.7 This statement assesses the Proposed Development against relevant national, regional, and local planning policy, guidance, and material considerations.
- 2.8 It should be read in conjunction with the other documents, planning drawings and technical studies submitted in support in support of this planning application as set out below:
- Planning Application Form, prepared by ROK Planning;
 - Community Infrastructure Levy (CIL) Form, prepared by ROK Planning;
 - Health Impact Assessment, prepared by ROK Planning;

- Site Location Plan, prepared by ThreeSixty Architecture;
- Existing and Proposed Plans, Elevations, and Sections, prepared by ThreeSixty Architecture;
- Design & Access Statement, prepared by ThreeSixty Architecture;
- Preliminary Ecology Appraisal (PEA) and Bat Roosting Survey, prepared by Applied Ecology;
- Biodiversity Net Gain (BNG), prepared by Applied Ecology;
- Energy Statement, prepared by Ensphere;
- Sustainability Statement, prepared by Ensphere;
- Sustainability Checklist, prepared by Ensphere;
- Transport Assessment, prepared by Ardent;
- Travel Plan, prepared by Ardent;
- Noise Impact Assessment, prepared by Ardent;
- Air Quality Assessment, prepared by Ardent;
- Flood Risk Assessment, prepared by Hydrock;
- Drainage Strategy, prepared by Hydrock;
- Basement Impact Assessment/ Structural Impact Assessment, prepared by Hydrock;
- Fire Statement, prepared by Marshall Fire;
- Construction Management Plan, prepared by Appian Construction;
- Community Engagement Report, prepared by The CCP;
- Aboricultural Assessment, prepared by A.T. Coombes Associates Ltd; and
- Land Contamination Report, prepared by Brownfield Solutions.

Scope of Planning Application

2.9 The report is structured as follows:

- Section 1 – Executive Summary
- Section 2 – Introduction
- Section 3 - Application Site and Context
- Section 4 – Relevant Planning History
- Section 5 – Proposed Development
- Section 6 - Planning Policy Context
- Section 7 – Planning Assessment
- Section 8 – Economic Benefits
- Section 9 – Planning Obligations
- Section 10 - Conclusion

3. APPLICATION SITE AND CONTEXT

- 3.1 The Application Site measures 0.31 hectares in the London Borough (LB) Richmond Upon Thames.
- 3.2 The Site fronts Oldfield Road and is currently occupied by an industrial building (Hilton Banks Ltd.), a distributor and supplier to the building and commercial trade industry.
- 3.3 The Site comprises a warehouse industrial building with offices located on the first floor (approx. 9.6 metres in height) and 36 ancillary car parking spaces, vehicle service area, a secure lorry parking area, and additional hardstanding.

Surrounding Area

- 3.4 The area surrounding the Applicant Site is characterised by a variety of commercial and residential uses.
- 3.5 Adjacent to the east of the Site is a two-storey Waitrose supermarket and a small row of commercial units/ shops, namely, local shop, café, dry cleaners, and takeaway.



Figure 1: Adjacent Waitrose Supermarket

- 3.6 To the West of the Site is a three-storey residential block Ryedale Court comprising two and three-bedroom residential units, with a car park and small communal garden to its rear.



Figure 2: Adjacent Ryedale Court

3.7 South of the Site comprises single and two-storey houses, and three-storey block of flats all fronting Oldfield Road.

3.8 To the north of the site lies a railway line, with a mix of residential properties beyond.

Site Designations and considerations

3.9 There are no statutory or locally listed buildings within the Site (or in proximity), nor is it located within a conservation area. As such, there are no considered heritage constraints to this development.

3.10 The Site is located within Flood Zone 1 indicating a very low likelihood of fluvial flooding, and a 'Very Low' risk of flooding from the surface water.

3.11 There are no Tree Preservation Orders (TPOs) on site.

Access

3.12 The Site is within TFL Transport Zone 6 and has a current Public Transport Accessibility Level (PTAL) rating of 2, indicating a moderately level of accessibility by public transport, given its location within the London Transport network.

3.13 The closest railway station is Hampton (South-Western Railway) which is approximately 300 metres from the Site (4-minute walk). This provides regular service to London Waterloo (via Kingston, Wimbledon and Clapham Junction) and Shepperton.

3.14 There are several bus routes within a short walking distance of the Site, served by bus routes 111 and 216 which providing access to a number of locations such as Hampton, Heathrow Airport, Hounslow, Kingston, Staines, and Sunbury.

4. RELEVANT PLANNING HISTORY

4.1 A search of LB Richmond upon Thames planning register shows the site planning history:

App ref:	Description:	Determination:
81/0411	Development for light industrial purposes comprising 1265.15 sqm (13,619 sq ft) of industrial floorspace with additional ancillary offices on two storeys and provision of 34 car parking spaces, (Amended drawings received 3/11/81 and 25/3/82).	Approved
83/1041DD01	Development for light industrial purposes, comprising a total of 1,591.94 sqm (17,136 sq. ft) of industrial floorspace, including ancillary offices on two storey and provision of 39 car parking spaces and two lorry parking spaces (Detailed Drawings – Condition 3 – External materials).	Approved
83/1041/DD02	Development for light industrial purposes comprising a total of 1,591.94 sqm. (19,130 sq. ft) of industrial floorspace, including ancillary offices of two storeys and provision 39 car parking spaces and lorry parking spaces. (Detailed Drawing Condition N(e) of planning permission 83/1041 dated 17/10/83.	Approved
04/2344/COU	Removal of conditions (a) on application 83/1041 to allow first floor offices to be used for purpose not ancillary to principal use of building.	Approved
06/0925/FUL	Erection of steel railing fence on top of existing brickwork wall and manual gates to match those along the front boundary.	Approved

Table 2: Relevant Planning History

4.2 In accordance with the above planning history, the current site is occupied by Hilton Banks who have occupied the premises in excess of 20 years and comprises a warehouse and open-air storage and wholesale distribution (Use Class B8).

4.3 There is a non-ancillary office use comprising 130.2 sqm within the building as consented under permission 04/2344/COU.

4.4 This confirms the established use of the premises / site comprises Use Class B8 and Use Class E (g)(i).

Pre-Application

- 4.5 In addition to the application history as listed above, the Applicant has sought pre-application advice (ref. 23/PO264/PREAPP) from LB Richmond upon Thames.
- 4.6 A pre-application was submitted on 25th October 2023, with an in-person meeting taking place on 4th December 2023 and formal written feedback being received on 4th January 2024.
- 4.7 Feedback from the initial pre-application was largely positive in terms of land-use, although raised several queries with regards to:
- 1) existing use of the site;
 - 2) the height, design, bulk and massing of the proposed buildings; and
 - 3) amenity impacts on existing occupiers.
- 4.8 In addressing these areas of question, a follow-up pre-application meeting took place on 8th February 2024. In support of this, additional information was submitted to LB Richmond upon Thames comprising the following:
- Revised drawing (floor plans and elevations);
 - VU.CITY Analysis Report (Jan 2024);
 - Stage 2 Document (Jan 2024);
 - Daylight Sunlight Impact Assessment (DLSL) (Neighbouring Properties);
 - Revised plans and CGIs; and
 - Letter from the Vendor.
- 4.9 Feedback from the follow-up pre-application meeting confirmed the following:
- The principle of the land-use of self-storage (Use Class B8) and office (Use Class E (g)(i)) is considered acceptable;
 - The amendment to the roof design, by which a stepped-mansard roof was incorporated was found to be less imposing on the street-scene and is a welcomed modification;
 - However, queries remained with regards to the impact of the roof which was deemed “visually dominant” and “intrusive” on the street scene;
 - The LPA confirmed that the further revisions to the roof and the removal of its upper part would be sufficient for the Council to support the scheme;
 - The Officer welcomed amendments to the front façade treatment and the incorporation of a wider range of materials and an active frontage, considering the design to be acceptable;
 - It was confirmed that the expansion of the business centre at the ground floor would likely be sufficient in addressing policy requirements to re-provide office space; and
 - The Daylight and Sunlight Report demonstrates the development to have a negligible impact on neighbouring properties.
- 4.10 All comments received during both pre-application meetings, in addition to the formal written response have been carefully considered in informing the proposed development, as presented within this Planning Statement.

5. PROPOSED DEVELOPMENT

5.1 This section of the report outlines the development proposal and should be read in conjunction with the other documents submitted in support of the application, in particular the Design & Access Statement.

5.2 The proposed development comprises:

“Demolition of existing building and provision of new self-storage facility (Use Class B8) and business centre (Use Class E (g)(i)).”

5.3 The footprint of the building will be 1,624 sqm. The development will comprise a two-storey building with a basement level as illustrated below:

	Self-storage (sqm)	Business centre (sqm)
Basement	2,000	
Ground	1,624	170
First	1,640	
Sub total	5,264	170
Total	5,434	

Table 3: Proposed development

5.4 The Business Centre (Use Class E (g) (i)) will be located on the ground floor fronting Oldfield Road and will measure approx. 170 sqm.

5.5 As such, the total employment floorspace to be delivered is 5,584 sqm.

5.6 The development has the potential to deliver an additional two floors through mezzanine (1,640 sqm & 1,010 sqm).

5.7 The proposed development therefore has the potential to deliver up to 8,084 sqm of employment floorspace across the site (Use Class B8 and E (g) (i)).

5.8 The building will use robust materials including metal sheet cladding on a steel frame. Glazing will be incorporated (particularly on the front elevation) with toughened laminated sections to be included as necessary.

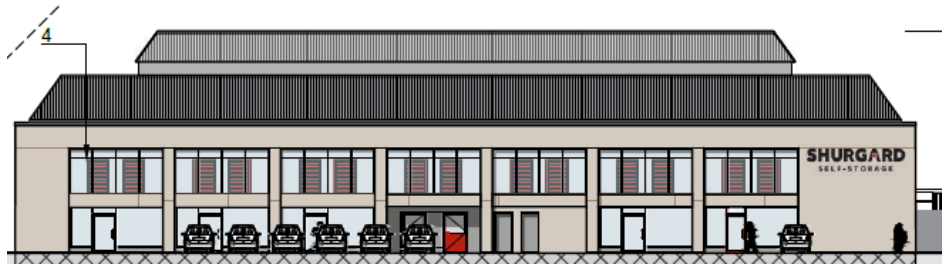


Figure 3: Proposed south elevation (front – Oldfield Road)



Figure 4: Proposed north elevation (railway)

- 5.9 A total of 10 car parking spaces will be provided including 1no. staff parking space, 2no. visitor car park and 7no. customer car parking spaces which will be separated by a secure gate.
- 5.10 There will be two Electrical Vehicle (EV) charging points located within the Site.
- 5.11 A total of 25no. cycle parking spaces will be provided including 22no. long-stay spaces and 3no. short-stay spaces. This will be provided by Sheffield Bike Stands located on the western boundary of the Site.
- 5.12 The applicant's design team has engaged with planning, design, and transport officers at LB Richmond upon Thames via pre-application meetings and communications. The original design has evolved in response to feedback. Further details of the proposed development and the design evolution are provided within the Heritage, Transport and Design & Access Statements.

6. PLANNING POLICY CONTEXT

National Planning Policy

- 6.1 The latest version of the National Planning Policy Framework ('NPPF') ('The Framework') was published in December 2023. The document sets out the government's economic, environmental, and social planning policies for development with the aim of developing in the most sustainable way possible.
- 6.2 The NPPF states that the purpose of the planning system is to advise and guide on best practice development which is as sustainable as possible. The NPPF stresses that the goal of sustainable development should not hinder or prevent future development.
- 6.3 The overarching national planning policy theme is that of sustainable development. The government have advised that this should be a central theme for plan making and decision taking. This is evidenced in para 11 which states that planning permission should be granted for development which accords with an up-to-date development plan without delay.

Development Plan

- 6.4 Section 38(6) of the Planning and Compulsory Act 2004 requires any planning application to be determined in accordance with the development plan, unless material considerations indicate otherwise. The relevant Development Plan of the area comprises the following documents.
- The London Plan (2021)
 - Richmond upon Thames Local Plan (2018)

London Plan (2021) Policies

- 6.5 The following London Plan policies are relevant to this planning application:
- Policy SD6 – Town centres and high streets
 - Policy D1 – London's form, character and capacity for growth
 - Policy D3– Optimising site capacity through design-led approach
 - Policy D4 – Delivering good design
 - Policy D12 – Fire Safety
 - Policy D 13 – Agent of Change
 - Policy D14 – Noise
 - Policy H2 – Small Sites
 - Policy E1 – Offices
 - Policy SI 1 – Improving Air Quality
 - Policy SI12 – Minimising greenhouse gas emissions

- Policy SI8 – Waste capacity
- Policy SI13 – Sustainable Drainage
- Policy T4 – Accessing and Mitigating transport impacts
- Policy T5 – Cycling
- Policy T6 – Car parking
- Policy T7 – Deliveries, servicing and construction

Local Plan (2018) Policies

6.6 The following Local Plan policies are relevant to this planning application:

- LP 1 – Local Character and Design Quality
- LP 2 – Building Heights
- LP 8 – Amenity and Living Conditions
- LP 10 – Local Environment Impacts, Pollution and Land Contamination
- LP 12 – Green Infrastructure
- LP 15 – Biodiversity
- LP 16 – Trees, Woodlands and Landscape
- LP 20 – Climate Change Adaption
- LP 21 – Flood Risk and Sustainable Drainage
- LP 22 – Sustainable Design and Construction
- LP 24 – Waste Management
- LP 28 – Social Infrastructure
- LP 30 – Health & Wellbeing
- LP 39 – Infill, Backland and Backgarden Development
- LP 40 – Employment and Local Economy
- LP 42 – Industrial Land and Business Parks
- LP 44 – Sustainable Travel Choices
- LP 45 – Parking Standards and Servicing

Planning allocation

6.7 In accordance with LB Richmond upon Thames Local Plan, the Site falls within the following designation:

- Industrial Land and Business Park (IBP)

6.8 There are no other allocations relevant to this Site within the adopted Local Plan.

Additional/ Supplementary Planning Documents

6.9 The following supplementary documents have also been consulted in informing this planning application:

- Air Quality (2020)

- Building of Townscape Merit (2015)
- Design Quality (2006)
- Planning Obligations Strategy SPD (2020)
- Strategic Flood Risk Assessment (2020)
- Hampton Village Planning Guidance SPD (2017)
- Refuse and Recycling Storage Requirements (2022)
- Secure by Design (2002)
- Sustainable Drainage Systems – Planning Guidance (2016)

Emerging planning policy

- 6.10 The draft Local Plan for Richmond upon Thames is currently in the latter stages of consultations (Regulation 19) Consultation on this document ran between 9th June to 24th July 2023.
- 6.11 The draft Local Plan was submitted to the Secretary of State for examination on 19th January 2024 for final review.
- 6.12 In accordance with Richmond LPA's current timetable, the Local Plan should be formally adopted by the Council in Winter 2024/2025. Following its adoption, the existing Local Plan and its policies will be superseded.

7. PLANNING ASSESSMENT

- 7.1 Section 38(6) of the Planning and Compulsory Act 2004 requires any planning application to be determined in accordance with the development plan, unless material considerations indicate otherwise.
- 7.2 This section of the Statement discusses the main planning matters relevant to the proposed development, including the principles of development, matters of scale and design, quality of accommodation for future residents, the relationship with surrounding properties along with a summary of the main technical matters which are dealt with in detail in the supporting reports.
- 7.3 The section is ordered as follows:
- Principle of land use
 1. Loss of existing facility
 2. Provision of Self-Storage
 3. Provision of Business Centre
 - Design & Layout;
 1. Height & scale
 2. Massing & materials
 3. Landscaping
 - Neighbouring amenity;
 - Basement Impact Assessment;
 - Flood Risk & Drainage;
 - Energy and sustainability;
 - Transport;
 1. Highways arrangement/ impact
 2. Car parking and refuse
 3. Cycle parking
 - Ecology;
 1. Biodiversity Net Gain (BNG)
 2. Urban Greening Factor (UGF)
 - Fire safety;
 - Trees;
 - Energy and sustainability;
 - Utilities;
 - Contamination;
 - Air Quality Assessment; and
 - Noise Impact Assessment
- 7.4 The following section(s) will assess the proposed development as listed above in relation to planning policy at a local and national levels.

Planning Assessment

Principle of land-use

Provision of new self-storage facility

- 7.5 The proposed development seeks to provide 5,264 sqm of high quality industrial floorspace (Use Class B8), comparative to the existing 1,498 sqm of B8 floorspace. This represents an uplift of 3,766 sqm.
- 7.6 This is supported by LP 40 of Richmond upon Thames Local Plan which promotes the retention of employment use for business, industrial and storage purposes in appropriate locations.
- 7.7 Under Local Plan Policy 42 the site is designated as an Industrial Business Park (IBP) which seeks to protect the scarce supply of industrial floorspace and where possible, enhance the existing stock of industrial premises to meet local need. Policy LP 42 aims to achieve this by:
- Loss of industrial floorspace will be resisted unless appropriate replacement floorspace is provided;
 - Development of new industrial floorspace and improvement and expansion of existing premises is encouraged;
 - Proposal for non-industrial uses will be resisted where the introduction of such uses would impact unacceptably on industrial activities (which may include waste sites).



Figure 5: Extract from interactive Policies Map showing LP 42 Industrial Land Business Park

- 7.8 Paragraph 10.3.8 of the supporting text further classifies the Site as a “Locally Important Industrial Land and Business Park”, noting the loss of such sites will be “strongly resisted unless appropriate replacement provision is provided”.
- 7.9 This is in accordance with London Plan policy E4 which supports the provision and retention of industrial and other related uses – including self-storage and logistics/ distribution - across three designation categories of industrial land: SIL, LSIS, and non-designated industrial land.
- 7.10 The Site is therefore considered to benefit from industrial land designation protections associated with both London Plan Policy E4 and Local Plan Policy 42.
- 7.11 Notwithstanding, the intensification, colocation, and substitution of employment/ industrial floorspace is considered to be in accordance with London Plan Policy E7 in stating:
- a. Development plans and development proposals should be proactive and encourage the intensification of business uses in Use Class B1C, B2, and B8 occupying all categories of industrial use through:*
- 1. Introduction of small units*
 - 2. Development of multi-storey schemes*
 - 3. Addition of basements*
 - 4. More efficient use of land through higher plot ratios having regards to operational yard space requirements (including servicing) and mitigating impacts of the transport network where necessary*
- 7.12 Policy E7 of the London Plan similarly seeks encouragement of intensification of business uses occupying all categories of industrial land through development of multi-storey schemes and more efficient use of land through higher plot ratios.
- 7.13 The site as existing comprises a main warehouse building and two storey office space measuring a total of 1,629 sqm of employment floorspace and is approximately 8.5 metres in height to the eaves.
- 7.14 The proposed development seeks redevelopment to comprise a basement level and three levels above ground, ensuring optimal use of the Site, while not materially increasing the overall height of the building on the existing street scene/ townscape.
- 7.15 Two further floors will be comprised by mezzanine flooring, whilst not increasing the overall height of the building (i.e. within the proposed volume). This additional floorspace will further intensify employment floorspace and providing an additional 2,650 sqm of B8 floorspace.
- 7.16 This is in accordance with Section 55(2)(a) of the Town and Country Planning Act 1990, planning permission is not required for the carrying out of maintenance, improvement

or other alteration to a building where works affect only the interior of the building and do not materially affect the external appearance of the building; this includes mezzanine floors for non-retail use. As such, additional floors can be installed at a later date through the use demountable mezzanines, without requiring planning permission.

- 7.17 It is therefore considered that the proposed development is fully in accordance Local and London planning policy, in seeking to intensify presently under-utilised employment floorspace. The development represents an overall uplift of 3,766 sqm of employment floorspace, with the potential overall uplift of 6,455 sqm. This will ensure the provision of suitable, sufficient, and high-quality industrial land to meet the needs of local people and the economy.
- 7.18 This is set within the context of recent resolution to grant planning permission at former Greggs Bakery No. 2 Gould Road, Twickenham, TW2 6RT (LPA Reference 22/2556/FUL) where the Council have ratified the loss of 7,371 sqm existing industrial floorspace. It is understood this represents some 7% of the total stock of existing warehousing / industrial premises within the entire Borough. The proposed intensification of the industrial uses at the subject site will therefore partly offset the recent loss elsewhere in the borough.
- 7.19 The NPPF further promotes the intensification approach, specifically Chapter 11 in “Making effective use of land” and paragraph 123 in the assertion that “policies and decisions should promote an effective use of land in meeting the need for homes and other uses”.
- 7.20 Notwithstanding, there is established mix of uses within the local area, including the supermarket use to the immediate east. As such, B8 uses are not considered to conflict with established land uses and does not mark a major departure from the existing use with the proposed operation materially similar industrial use and in accordance with the development plan.
- 7.21 It is therefore not considered to adversely impact upon future residential development that may come forward within the vicinity of the Site.
- 7.22 Overall, the proposed development is considered to meet industrial employment policy objectives, in accordance with Local Plan policies LP40, LP42, and London Plan policies E4 and E7.

Provision of business centre

- 7.23 As well as the self-storage provision, the development seeks to provide an additional 170 sqm Business Centre (Use Class E (g)(i)).
- 7.24 A letter prepared by the existing operator of the Site is submitted as evidence in this application. The enclosed letter confirms the total non-ancillary office floorspace that

has been marketed to third parties (in accordance with permission ref: 04/2344/COU) to be a total of 130.2 sqm. The split of this is outlined below:

Suite	Floorspace (sqm)
<i>Suite B</i>	<i>52 sqm</i>
<i>Suite C</i>	<i>43.2 sqm</i>
<i>Suite E</i>	<i>18 sqm</i>
<i>Suite F</i>	<i>17 sqm</i>
Total	130.2 sqm

Table 4: Existing non-ancillary office floorspace

- 7.25 The remaining area at the first floor has continued to be used for storage by the wholesale distributor that operates the Site, Hilton Banks Group. As such, this space remains ancillary space as associated with the principal storage / distribution use of the building (Use Class B8).
- 7.26 In supporting a strong local economy, Local Plan policy LP 41 and emerging policy 23 determines there to be “presumption against the loss of office floorspace throughout the borough”. This is further supported in paragraph 10.2.4 which states “proposals that could result in loss of office floorspace out of designated Key Office Area, the applicant must provide robust and compelling evidence which clearly demonstrates that there is no longer demand for an office-based use in this location”.
- 7.27 In accordance with the above, the development seeks to provide a 170 sqm Business Centre (Use Class E (g)(i)) to be located facing Oldfields Road, at ground floor level.
- 7.28 During the pre-application process the Officer confirmed that the provision of 170 sqm Business Centre - representing an overall uplift of 39.8 sqm - to meet and exceed the policy requirements of local plan policy LP 41.
- 7.29 As such, it is considered that the reprovision and intensification of employment and office floorspace represents a material planning benefit of this proposal which should be awarded significant weight in the consideration of this application.
- 7.30 In making more effective use of existing underutilised employment land and industrial land, the proposed development is in accordance with Local Plan policies LP 40 and 42, London Plan policies E4 and E7, as well as paragraph 123 and 124 of the NPPF.

Design & layout

- 7.31 National, regional, and local policy places emphasis on the design of new development, requiring proposals to respect the architectural character of the surrounding area and to minimise the impact of neighbouring amenity.

- 7.32 Policies LP 1 and LP 2 of the Local Plan require all development to be of high architectural and urban design quality and strengthen the setting of the borough's valued townscapes and landscaped. This will be achieved through:
- b. Compatibility with local character including the relationship to existing townscape, development patterns, views, local grain and frontages as well as scale, height, massing, density, landscaping proportions, form, material and detailing
 - c. Appropriate building height making a positive contribution towards local character, townscape and skyline and generally reflecting the prevailing building heights within the vicinity.
 - d. proposals which are taller than the surrounding townscape are required to be of a high architectural design and standards, deliver public realm benefits and have a positive impact on the character and quality of the area
- 7.33 London Plan policies D1, D3 and D4 further champion well designed places. Policy D4 secures this through “ensuring maximum detail appropriate for the design stage” to safeguard avoidance of “deferring the assessment quality” for a later stage.
- 7.34 More specifically, London Plan policy D3 promotes a ‘design-led approach’ through the optimisation of site capacity, noting development proposals should:
- Enhance local context by delivering buildings and spaces that positively respond to the local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions
 - Encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings,
 - Be street-based with clearly defined public and private environments
 - Facilitate efficient servicing and maintenance of buildings and the public realm, and minimise negative impacts on the environment, public realm and vulnerable roads
 - Achieve safe, secure and inclusive environments
 - Provide active frontages and positive reciprocal relationship between inside and outside the building
 - Deliver appropriate outlook, privacy and amenity
 - Achieve indoor and outdoor environments that are comfortable and inviting to people
 - Respond to the existing character of place by identifying the special and valued features and characteristics of the locality
 - Be of high quality, with architecture that plays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan
 - Aim for high sustainability standards
 - Provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places

7.35 The proposed development has been carefully designed in considering relevant policy as listed above, as well as the detailed feedback received from the Planning and Design Officer throughout the pre-application process.

Height and scale

7.36 The proposed development has a maximum ridge height of 12.57 metres and incorporates a 'stepped' mansard roof design.

7.37 The height to the apex of the main roof is approx. 1-metre lower than the existing Ryedale Court and approx. 0.3 metres higher than the roof of neighbouring Waitrose supermarket.

7.38 The height of the parapet (7.35 metres) broadly aligns with the parapet level of Ryedale Court. This assists in maintaining a consistent and coherent streetscape.

7.39 The development incorporates a stepped roof design, with the uppermost floor possessing a set-back of 3 metres.

7.40 The stepped roof design and set-back of the uppermost part of the roof will therefore largely be obscured from street level only be visible in glimpsed and longer-range views.

7.41 This is considered to effectively break up perceived visual bulk of the roof and sits comfortably within the existing street scene, given the established relationship with the neighbouring building on either side.

7.42 This further address concerns raised in the pre-application with regards to the perceived height of this building by limiting the height of the principal roof to the equivalent of three-storeys. This is considered to be in keeping with the neighbouring buildings to either side (and slightly lower than neighbouring Ryedale Court).

7.43 This approach was supported in the follow-up pre-application meeting which took place on 8 February 2024.

7.44 As such, the height of building is thought to be sympathetic to the existing character and context in accordance with LP1, LP2 of the Local Plan, and London Plan Policy D1, D3 and D4.

Massing and materials

7.45 The proposed self-storage building is aligned with the established building line on Oldfield Road and is in-line with the principal elevation of both Ryedale Court and Field House (Waitrose). This is to ensure the development fits in with the existing townscape and neighbouring amenity.

- 7.46 Following pre-application feedback, the design was amended to incorporate a recessed entrance at the centre of the front elevation.
- 7.47 The amended appearance to the Oldfield Road façade incorporates extensive glazing at ground floor, in which the majority denotes the expanded office use, and forms an active frontage along the southern elevation.
- 7.48 The side elevations incorporate an element of grey and red metal sheets cladding, recessed brickwork, and signage to ensure a varied and interesting design.

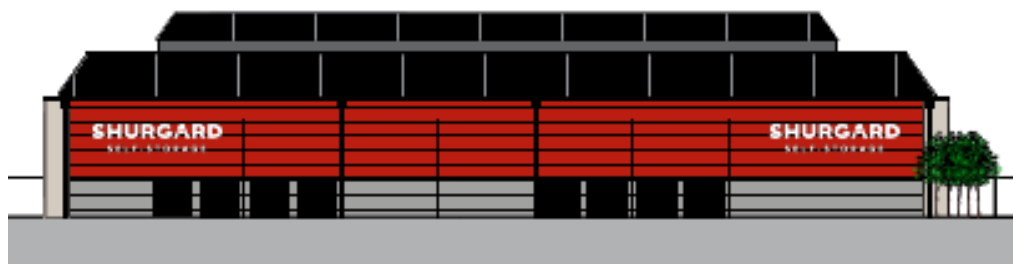


Figure 6: Northern elevation (Railway Line)



Figure 7: Side Elevation

- 7.49 Planting of an additional 20 trees and boundary treatments and soft landscaping are proposed on the Oldfield Road and side boundaries. This will soften the overall impact of the proposed building of the existing street scene, whilst additionally adding to the biodiversity and sustainability credentials of the proposed development.

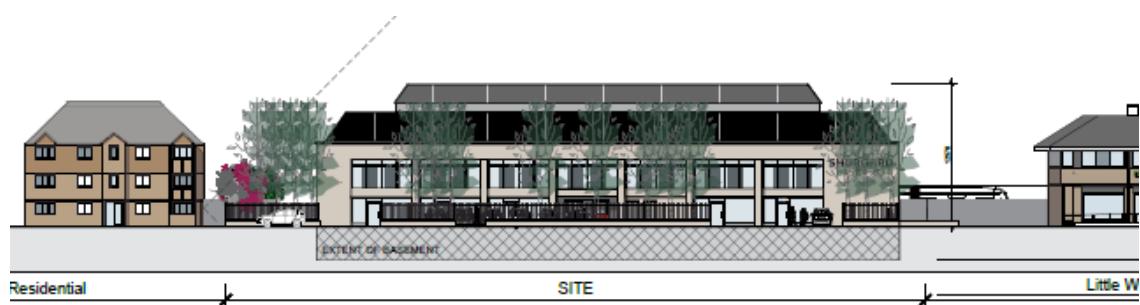


Figure 8: Contextual southern elevation (Oldfield Road) with planting

7.50 The scale and massing of the building is therefore considered to be in accordance with the design criteria as set out in Local Plan policies LP 1 and LP 2, and London Plan policies D1, D3, and D4.

Landscaping

7.51 The supporting landscape strategy proposes the following measures:

- Retaining all existing trees on the site
- Planting of an additional 20 trees across the site within wildflower plugs and bulbs
- Clearance of existing non-native shrubs and re-seeding with flowering lawns grass and wildflowers
- Planting of mixed native species/ hedging
- Mixed shrub planting on boundaries

7.52 It is considered that the landscape-led design will soften the overall visual impact of the development on the street scene, whilst adding to the site biodiversity and ecological credentials.

7.53 This is in accordance with policy LP 12, 15, LP 16, and LP 20 of the Local Plan.

Neighbouring amenity

7.54 In support of the development proposal a Daylight and Sunlight (DLSL) Report and Impact Assessment on neighbouring properties was prepared in February 2024.

7.55 As noted within the supporting report, the majority of adjoining properties are non-domestic buildings namely Field House, 63 Oldfield Road and Linden Hall and therefore do not have a requirement for DLSL within the BRE guidelines.

7.56 A Vertical Sky Component Test (VSCT) illustrates windows 203, 212, 213, 222 and 223 of Ryedale Court do not meet BRE recommendations, however, the overall impact is considered negligible given they are understood to be 'small kitchens'/ non-habitable rooms that measure less than 13 sqm.

7.57 This is in accordance with Richmond Local Plan para 4.8.8 which states "whilst there will be some impact from any new development, the test is one of harm in relation to the impact on habitable rooms, which includes all separate living rooms and bedrooms, plus kitchens with a floor area of 13 sqm or more".

7.58 The report particularly assesses the impact of the proposed development with regards to its impact on adjoining residential development Ryedale Court.

7.59 An assessment of the Site confirms there are no primary habitable windows that directly face on to the proposed self-storage facility. This is reflected in the DLSL report which concludes "all neighbouring **windows that have a requirement** for daylight or sunlight

pass the relevant BRE diffuse daylight and direct sunlight tests. The development also passes the BRE overshadowing to gardens and open space test.” The windows that currently do not meet the BRE guidelines are considered secondary / do not serve a habitable room.

- 7.60 The assessment further tests sunlight to windows (all windows that face 90 degrees), as well as overshadowing to gardens and open space. The proposed development is found to meet the BRE recommendations.
- 7.61 A letter dated 12th March 2024 confirms that the latest drawings illustrate a reduction in massing and are therefore considered to mark an improvement in terms of the impact on immediate neighbours and sufficiently safeguard the daylight and sunlight amenity of neighbouring properties.
- 7.62 Overall, the DLSL assessment determines the proposed development to have a “low impact on the light receivable by its neighbouring properties”, sufficiently safeguarding the amenity of neighbouring properties in accordance with policy LP 8 of the Local Plan.

Basement Impact Assessment

- 7.63 In support of the planning application a Basement Impact Assessment (BIA) is submitted. It is noted that a separate Structural Impact Assessment is not required as “there are no listed buildings within 250m of the site”.
- 7.64 The BIA makes the following conclusions/ recommendations:
- The site is in an area of medium-high risk from groundwater flooding. As such, mitigation measures such as ‘underground corridors with high permeability’ are advised
 - During temporary works, dewatering will be required to provide a safe works area. A closed cofferdam, formed using bored secant piles (or sheet pile wall, if suitable) is considered suitable
 - During development of the construction methodology and design, consideration should be given to the risk of ground settlement of adjacent land associated with dewatering beyond the footprint of the proposed basement
 - Once built, the development should be waterproofed and strategy to remove water implemented
 - Additional ground investigation should be undertaken following demolition of the existing structure
 - Additional groundwater monitoring should be undertaken to inform design and to establish a baseline for groundwater
 - Assessment of ground movement and impact on third-party assets is expected to be a significant factor in the development of the design. Engagement with asset owners is suggested, to ensure their requirements can be accounted for.
- 7.65 It is understood that all recommendations as listed above can be secured by condition.

Flood risk

- 7.66 A Flood Risk Assessment has been prepared and submitted in support of this application by Hydrock.
- 7.67 The detailed assessment of the Site confirms it to be located in Flood Zone 1 and to have a 'low' or negligible risk of flooding from all sources.
- 7.68 As such, the report determines the proposed development:
- Is suitable location for development subject to mitigation measures;
 - Will be adequately flood resistant and resilient;
 - Will not place additional persons at risk of flooding, and will offer safe means of access and egress;
 - Will not increase flood risk elsewhere as a result of the proposed development through the loss of floodplain storage or impeding flood flows;
 - Will put in place measures to ensure surface water is appropriately managed.
- 7.69 This is in accordance with Local Plan policy LP 21 and requirements of the NPPF.

Drainage

- 7.70 The drainage strategy has been prepared in support of this application by Hydrock.
- 7.71 The reports makes the following conclusions:
- Surface water is discharged at 2l/s
 - 190m³ of attenuation storage is needed
 - There is a very small foul water discharge
 - SuDS are to be green roof and porous paving
 - Surface and foul water will be pumped into Thames Water sewers
- 7.72 As such, the report makes the following recommendations:
- Site levels design is mindful of surface water flows
 - Site levels do not let water flow or pond inside the building or leave the site
 - Invert levels of Thames Water sewers are confirmed
- 7.73 As such, the proposed development is considered to fully accord with all flood risk and drainage requirements in accordance with policy LP 20, 21, and 22 and NPPF policy requirements.

Energy and sustainability

- 7.74 In support of this planning application an Energy Statement, prepared by Ensphere is submitted, providing an overview of the energy strategy of the site context, anticipated energy requirements and local priorities and initiatives.
- 7.75 As such, several requirements reducing the scheme carbon footprint and maximising the potential of renewable energy in the energy demand are incorporated within the proposed development:
- Reduction in carbon emissions through efficiency measures in accordance with the 15% target;
 - ASHPs to be applied to the space for heating for the reception/ shop areas;
 - Hot water to be provided by instantaneous electric heaters on the basis that demand is very low and this type of system avoids storage losses;
 - On-site carbon saving of >35% relative to Building Regulations Part L 2021;
 - Fully electric system / Net Zero, in-line with the decarbonisation of the National Grid;
- 7.76 The development has carefully considered the above requirements and recommendations. This is further illustrated within the Sustainability Statement which confirms a range of sustainable design and construction features including:
- Air Source Heat Pumps will be provided for the reception/ shop area
 - Highly thermally efficient building fabric
 - Highly efficient lighting
 - Water saving fittings and appliances
 - Use of materials and a low lifecycle environmental impact and embodied energy
 - Efficient construction and waste management
 - BREEAM “Excellent” rating as a minimum target
- 7.77 In accordance with the Sustainability Checklist Guidance, the enclosed Sustainability Checklist confirms the development to meet sustainability requirements, achieving an overall score of 50.
- 7.78 Overall, the proposed energy strategy is considered to be consistent with the National Planning Policy Framework, London Plan Policy SI2, SI3, and Local Plan policy LP 22, representing an efficient and low carbon development.

Transport

Highways arrangements/ impact

- 7.79 In support of this application a Transport Statement and Strategy has been prepared by Ardent.
- 7.80 Consolidation of vehicle access is proposed on Oldfield Road by narrowing the existing vehicle access at the southeastern corner of the site and amending it to one-way access only.

- 7.81 This is considered to reduce the potential for conflicting vehicle movements/ vehicle access.
- 7.82 Trip assessment of the site, based on data from an existing Shurgard site shows that the potential trip generation of the proposed development is negligible, especially when comparing it to the existing uses on site. It is noted that the development may lead to net increase of 3 vehicle trips in peak travelling hours, however, will represent an overall reduction in vehicle trips throughout the day.
- 7.83 The enclosed Travel Plan further supports this overall reduction through the promotion of active modes of travel to and from the site, as well as provision of viable alternative modes of transport such as the local bus and trains.
- 7.84 Notwithstanding, given the nature of the self-storage use, the proposed development will no longer require HGV parking arrangements.

Car parking and refuse arrangements

- 7.85 The proposed development provides a total of ten on-site vehicle parking spaces of which one will be reserved for disabled users. Two spaces will provide active electric vehicle charging infrastructure with passive infrastructure provided for the remaining bays. This is calculated based on anticipated operational need and is in accordance with London Plan Table 10.4.
- 7.86 The layout of the proposed development accords with minimum local car parking standards.
- 7.87 Swept path analysis of a refuse vehicle is submitted in support of this and demonstrates that service vehicles are able to enter/access the Site.

Cycle parking

- 7.88 The proposed development provides a total of 31 cycle spaces (21 long-stay and 10 short-stay), in accordance with the LBRUT/London Plan standards.
- 7.89 The proposed development includes short-stay spaces, 2 cargo bike parking spaces are proposed to encourage the sustainable transport of goods.
- 7.90 Cycle parking within the site will be provided at ground floor level and has been designed in accordance with Chapter 8 of TfL's 'London Cycling Design Standards' (September 2016).
- 7.91 The provision of cycle parking further promotes active modes of travel and further adds to the development sustainable development credential in support of Local Plan policy LP 30.

- 7.92 Overall, the supporting transport statement and analysis confirm the proposed development to have a negligible impact on the free-flow and safety of the immediate highway network, and that the development can accommodate existing highway and public transport networks, both in highway safety and capacity terms
- 7.93 Thus, the proposed development is considered to be in accordance with London Plan policies T4, T5, T6 and T7 and LP 30, 44 and 45 of the Local Plan.

Ecology

- 7.94 In support of the planning application Applied Ecology have undertaken Preliminary Ecology Appraisal (PEA) and Preliminary Roost Assessment (PRA) to determine any likely ecological constraints associated with the proposed self-storage facility.
- 7.95 The PRA confirms the Site to be unsuitable for bats, and therefore does not require any further survey for bats in the development proposal.
- 7.96 The PEA survey found no features of ecological significance on the Site, however, recommends a series of measures in contributing to the Site's overall Biodiversity Net Gain (BNG).

Biodiversity Net Gain

- 7.97 In accordance with the Environmental Act 2020, the proposed development achieves a **35% BNG result, significantly exceeding** the 10% legislative requirement.

Urban Greening Factor

- 7.98 The proposed development achieves an **UGF score of 0.3**. This is in accordance with London Plan Policy G5.
- 7.99 Overall, the proposed development is considered to be in accordance with London and local planning policy, including London Plan policy G5, and Local Plan LP 15 and LP 20.

Fire Safety

- 7.100 In support of this planning application a Fire Safety Statement has been prepared by Marshall Fire.
- 7.101 As such, the report requires the following measures:
- The cleaner's stores are to be fire rated to at least 30 minutes fire resistance with doors equal to FD30S.
 - The service risers breaching the ground floor compartment line are to be at least 60 minutes fire resisting with FD30S fire doors.

- The office accommodation will be independent from the rest of the building having 60 minutes fire resisting construction acting as a party wall to the other use.
- The stairs being firefighting stairs are to be enclosed in 120 minutes fire resistance. The firefighting stair lobbies are to be 120 minutes but the wall between the stair and lobby can be reduced to 60 minutes with a FD30S fire door.
- The ground floor stair extensions are to equal 120 minutes fire resistance leading to the final exit.
- The basement lifts are to have a fire rated lobby of 30 minutes fire resistance with FD30S fire doors.
- The storage units are not fire rated but they are within a large warehouse space with sterile corridors, and the unit will be of non-combustible and limited combustibility materials.
- The basement is required to be a compartment floor equal to the elements of structure (i.e. 60 minutes) and the client wishes to enhance all other floors to be compartment floors with a maximum protected fire area of than 900m2.
- The lift core is to have a protected shaft of 60 minutes as it breaches the compartment floor.

7.102 The proposed development is found to be in accordance with Planning Gateway One, and Fire Safety standards as outlined in Approved Document B, Vol2, 2022.

7.103 It is proposed that all measures as listed above can be secured via condition as required.

7.104 As such, the development is fully in accordance with London Plan policy D12.

Trees

7.105 An Arboricultural Impact Assessment and Tree Protection Plan has been prepared and submitted in support of this application.

7.106 The report concludes that all trees can be retained and protected in accordance with BS5837:2012.

7.107 A further revised Arboricultural Impact Assessment together with a Tree Protection Plan and Arboricultural Method Statement is recommended. It is proposed that this can be secured by condition following consent of the proposal.

Contamination

7.108 A Phase 1 and 11 Geo-Environmental Assessment Report has been prepared by Brownfield Solutions in support of this application.

7.109 The report makes the following recommendations necessary to progress the Site for construction phases:

- Demolition asbestos survey.
- Further intrusive investigations – Post demolition, including Cable Percussive boreholes and Window sampling to confirm ground conditions within the existing building footprint.
- Detailed foundation design by structural engineer.
- Design of remedial strategy and confirmation with the Local Authority.
- Implementation of the remedial strategy and verification of remedial works.

7.110 It is determined that the recommended works as listed above be undertaken and secured by condition.

7.111 Thus, the proposed development is considered to be in accordance with LP 10 of the Local Plan.

Utilities

7.112 A letter dated 18th March 2024 confirms an application has been made with Thames Water for a potable water and foul sewage connection to the existing network.

7.113 The water supply for the proposed store is 25mm – this is considered to be a standard connection that will be equivalent or less than the existing building supply.

Air Quality Assessment

7.114 In support of the proposed development sustainability credentials, an Air Quality Assessment (AQA), prepared by Ardent, is submitted.

7.115 The assessment considers the impact of construction and operational traffic generation associated with the proposed development on nearby receptors. The overall effect is determined to be “not significant”.

7.116 It also considers pollutant concentrations within the site on future use of the proposed development. The future use of the development is found to experience good air quality.

7.117 Overall, the report concludes the development to be better than ‘air quality neutral’ in terms of both building and transport emissions. This is in accordance with Local Plan LP 10 and one of its overarching strategic policy objective to “encourage improvements in air quality”, in addition to London Plan policy SI 1.

Noise Impact Assessment

7.118 In support of this planning application, a Noise Impact Assessment (NIA) has been submitted and prepared by Ardent.

- 7.119 Target noise and vibration limits have been set for construction noise to achieve in accordance with BS5228. Best practice recommendations have been provided to reduce noise and vibration by as much as practicably possible.
- 7.120 The report further concludes/ recommends:
- Given the nature of activities associated with self-storage, operation will have no adverse impact at the nearest sensitive receptors
 - The change in traffic numbers will be slightly reduced and have no adverse impact on the development
 - Fixed plant equipment should be selected to achieve a cumulative rating level than 37dB and 31dB during the day and night for receptor 1, and 36dB and 30dB during the day and night for receptor 2.
- 7.121 Overall, the assessment demonstrates the site to be suitable for development and there to be no adverse impact on of existing residential amenity in accordance with policy LP 10 of the Local Plan and London Plan policy D13 and D14.

8. ECONOMIC BENEFITS

Direct Employment generation

- 8.1 The new self-storage facility will employ around **3-4** direct full-time employees (FTE), while the on-site business centre will provide an additional **15 FTE jobs**. This equates to 19 on-site employees.

Indirect Employment Generation

- 8.2 Self-storage facilities create a significant amount of indirect employment with many small businesses choosing to base their operations from their individual self-storage units, therefore playing a crucial role in supporting the local economy. For example, self-storage provides:
- a. Flexible low-cost space that does not have the long-term commitment of leases that come with renting traditional business floorspace. Self-storage facilities therefore need to provide a space that businesses can work and grow their business;
 - b. Business base for individuals who travel to their customers but need somewhere to store equipment;
 - c. A hub for micro and small-medium sized enterprises vital to Hammersmith and Fulham employment needs.
- 8.3 Occupier data from Shurgard confirms that 75% of occupiers are based within 10mins drive of a typical store thus focussing employment generation within the borough. Shurgard's existing London portfolio identifies approximately 20% of customers to be business customers, with the majority being start-ups and SMEs; this equates to 200 businesses per average 1,000-unit self-storage facility. This figure is augmented by micro enterprises referred above, reaching up to 30% of prospective customers / users associated with the proposal.
- 8.4 Taking the average business / commercial user ratio of rented sqm floorspace in Shurgard stores of 30% (see above), the facility will dedicate between **1,579sqm** and **2,374.2 sqm** to business users, principally SMEs and start-ups including those in creative media and trade. The proposed Shurgard store at Carnwath Road would therefore generate an additional **31-47 jobs**, as per the Employment Densities Guide and London Employment Sites Database.

Total employment generation

- 8.5 Overall, the proposed development will therefore generate a total of **50-66** employment opportunities.
- 8.6 This represents an uplift of **28-34** employment opportunities (when compared to the existing **22-32** employees).

Construction

- 8.7 The construction of the development will also generate employment. It is estimated that that construction will take 12 months and would support an average of 120 construction jobs within the sector over the duration of the development.

Employee spending

- 8.8 There will be an additional benefit via the increase in expenditure in the local area associated with the **50-66** new jobs created.

Industrial need/ provision

- 8.9 London Industrial Land Supply Report produced by AECOM for Greater London Authority as published in March 2023 confirms Richmond upon Thames to have a total of 8.7 hectares of warehouse, self-storage, and open space (self-storage accounts for just 0.4 hectares), and 17.3 hectares of industry (general and light industry).
- 8.10 When accounting for all wider industrial use in the borough, Richmond upon Thames is considered to have a total of 83.8 hectares on industrial land and a vacancy rate of just 0.4% -0.7%.
- 8.11 Conversely, LB Richmond upon Thames has seen a significant depletion in its provision of industrial floorspace in recent years. Most recently application ref. 22/0900/OUT received a resolution to grant at committee on January 31st, 2024. The proposal involved the redevelopment of an allocated industrial site (SA24) for mixed-use including office, retail and residential. This represents a loss of 35,402 sqm of industrial floorspace.
- 8.12 This is in addition to the loss of LSIS designated former Greggs industrial site (ref. 22/2556/FUL), representing the loss of 7,371 sqm of industrial floorspace (Use Class B2).
- 8.13 Specifically, Richmond upon Thames Employment Floorspace Monitoring report illustrates there to have been a significant depletion in the provision of self-storage/B8 floorspace as illustrated below:

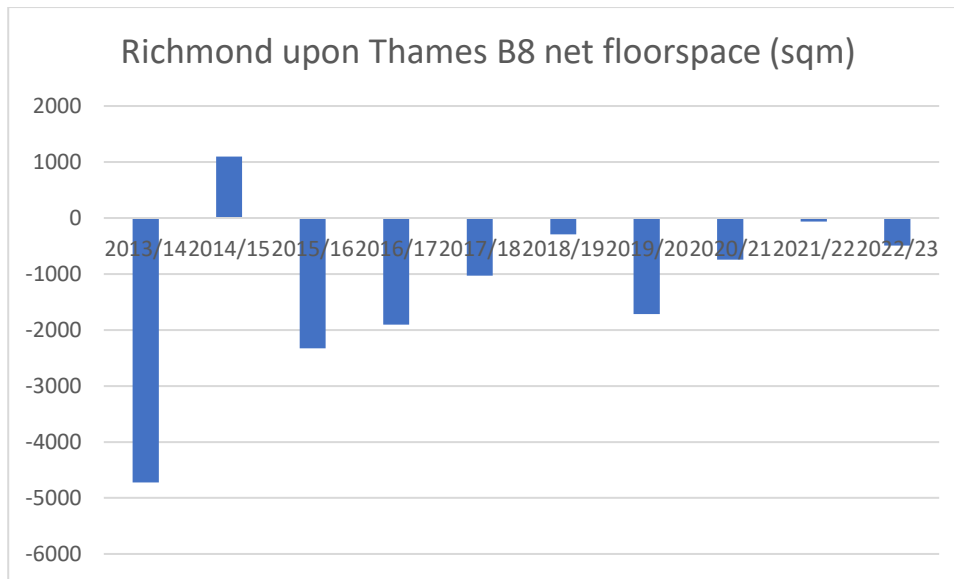


Figure 9: Richmond Employment Floorspace Monitoring Report (January 2024)

8.14 Between 2013 and 2022 Richmond upon Thames has seen a net loss of -12,187 sqm of self-storage floorspace.

Small business and start-up space

8.15 The Self-Storage Annual Report 2022 (Cushman & Wakefield, Self-Storage Association UK) identifies key findings of the self-storage sector in that year. This includes that 84% of businesses that use self-storage facilities have less than 100 staff. The UK definition of a small and medium-sized enterprise (SME) is one which has less than 250 employees; therefore, the Annual Report identifies a significant usage of self-storage facilities by SMEs.

8.16 The Local Plan acknowledges the importance of small businesses in strengthening the economy, as noted within paragraph 10.1.2 which states: “The borough has a significant local economy, with a high proportion of small businesses serving local residents and other local business. It is therefore vital in terms of local economic and environmental sustainability objectives to protect and enhance this provision.”

8.17 The passage goes on to determine that lack of sufficient employment floorspace is “a constraint on future employment and business growth” noting it is “imperative that sufficient well-located employment land is retained or redeveloped to meet modern business needs and support a strong sustainable economy.” It is therefore illustrated that the provision of employment floorspace to meet the needs of SMEs is understood to be a high priority of the Council in serving the local economy and securing future prosperity for the borough.

- 8.18 The role of SMEs and their contribution to the local economy has been further recognised in Richmond’s most recent Employment Land and Premises Need (2021), which confirms supporting of micro businesses and small businesses as one of the Council’s main priorities.
- 8.19 Within this report it is distinguished that micro-small businesses require flexible office spaces which allow businesses to grow on premises and expand, determining the appropriate property typology to be SME office units/ co-working space, and light industrial studio/ work rooms.
- 8.20 The provision of a self-storage facility and Business Centre is therefore considered to accord with the requirements of SMEs as listed above.
- 8.21 Furthermore, research into Richmond Borough Profile (2020) confirmed the boroughs local economy to be characterised by the large proportion of micro-business units with the majority of businesses falling within the SME category. This accounts for a total of 13,535 businesses in Richmond (in which 93.1% employ fewer than 10 people).
- 8.22 Further findings of the report confirm a total 14.6% of Richmond’s population to be self-employed, which is higher than the London average of 11.1%.
- 8.23 The Council’s ‘Direction of Travel’ document, February 2020, sets out the key themes and objectives of a future local plan, highlighting the economic challenges facing the borough including limited land available for employment.
- 8.24 The document prioritises the need to increase jobs and help businesses grow, citing a number of challenges presently facing the borough, namely the lack of affordable businesses and pressure for redevelopment to residential land. In addressing these concerns, the following policy directions are set out:
1. Establish through future employment evidence base work if further Locally Significant Industrial Sites and/or Key Office Areas should be designated in the Local Plan in order to ensure that sufficient affordable premises are available for a range of businesses, but in particular SMEs
 2. Provide further guidance on the types of offices that could be encouraged through the Local Plan employment policies
 3. Require all development providing economic floorspace to contribute to the provision of affordable, flexible and/or managed workspace to support local enterprise and business development
 4. Encourage intensification of existing employment sites, particularly industrial land, for further industrial uses rather than substitution
- 8.25 This is further recognised within Local Plan strategic objectives in which the council prioritises and aims to “facilitate inward investment and support local business,

particularly small and medium sized enterprises” in meeting the needs of local people and demands of the local economy.

- 8.26 Given the low vacancy rates and depletion of industrial floorspace in recent years, and more specifically B8 industrial floorspace, evidence clearly indicates that the needs of 93.1% of the boroughs enterprise (as cited above) is not being met. Thus, it seems unquestionable that SMEs will begin to look elsewhere in neighbouring boroughs to meet this acute need.
- 8.27 The proposed development will provide a hub for micro and small-medium sized enterprises vital to Richmond upon Thames employment needs, and provide flexible, low-cost space with flexibility of leases, allowing SMEs to thrive and grow.
- 8.28 The proposed mixed-use development, which includes both the Self-Storage and Business Centre Facility, is seen to respond to the changing demands of Shurgard customers and will further support the operation and growth of local small and medium enterprises.
- 8.29 As highlighted within Annual Self-Storage Report and Shurgard’s own demographic analysis, the proposed self-storage facility will act as an incubator and provide support to help these businesses grow. Through providing flexibility of unit sizes and licenses, it allows businesses the flexibility to upsize and downsize their units as required, whether that be due to seasonal demand or cost management.
- 8.30 This represents flexibility that would not come with a fixed term lease on a small industrial or business unit thus allowing business to manage costs effectively and grow especially at incubator / early stages, therefore supporting sustainable economic growth in the area.

Benefits of Shurgard self-storage

- 8.31 The development will deliver a minimum of 5,264 sqm (GEA) of new self-storage space (Use Class B8) (with potential to increase this approx. 8,068 sqm via additional mezzanine levels) and 170 sqm Business Centre (Use Class E) (g) (i)).
- 8.32 The space will be delivered by Shurgard – Europe’s leading self-storage provider – and a prominent SME landlord.
- 8.33 Shurgard operates across seven countries (Netherlands, France, Sweden, U.K. Belgium, Germany, and Denmark) across 274 stores, 190,000 customers and over 1.4 million sqm of rentable floorspace.
- 8.34 Between December 2014 and September 2023, Shurgard have completed redevelopment projects at 31 stores and acquired a further 64 stores across Europe.

8.35 Within the UK, Shurgard have 44 stores – all of which are located within the Greater London area.

8.36 Shurgard’s focus of development is on attractive and cycle-resilient urban areas that are strategically located and easily accessed by customers - in areas with strong growth potential.

Self-storage space

8.37 There is fast-growing demand for small self-storage spaces in meeting the needs of start-ups, micro-enterprises, SMEs and workspace trends including e-businesses and home-working.

8.38 The CBRE Industry Report (2022) shows the self-storage market have grown by 70% in the past five years, with the UK remaining the market leader, accounting for 38.6% of this growth. The FEDESSA/CBRE Industry Report (2022) shows the self-storage market have grown by 70% in the past five years, with the UK remaining the market leader, accounting for 38.6% of this growth.

8.39 The growth in business use of Self Storage facilities is reflected in the continued and increasing number of new business customers that Shurgard has attracted across the last ten years:

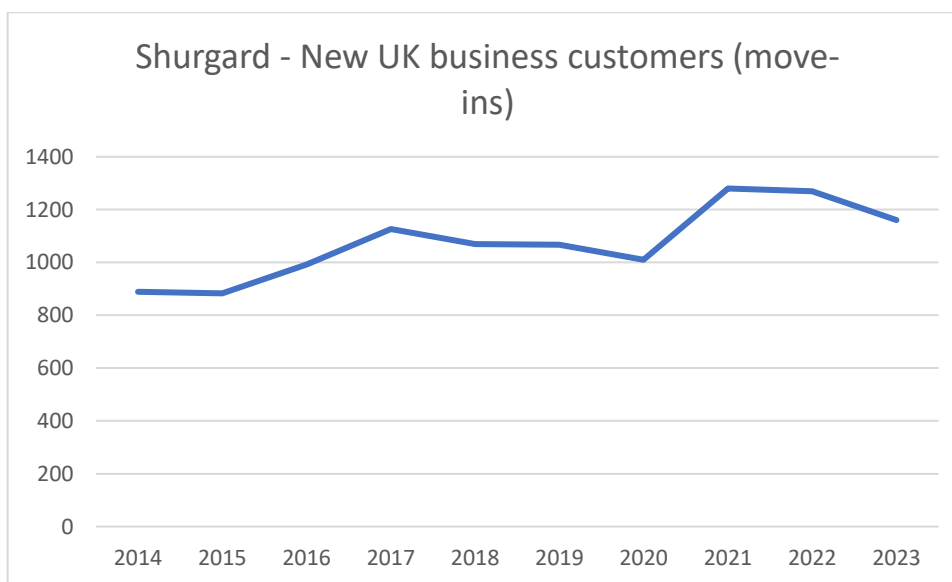


Figure 10: Shurgard data

8.40 As illustrated, Shurgard have seen an average of new 1,075 businesses per annum, with this figure anticipated to continue to grow.

Interconnected space

8.41 The provision of a Business Centre at the ground floor of the development incorporates a mix of uses into the typical single-use self-storage facility and provides co-working and office space.

8.42 This is a growing trend of self-storage operators, as they seek to adapt to the changing needs of tenants and offering easy and flexible solutions to small business customers.

Shurgard Customer Experience

8.43 Customers highly value the flexibility that Shurgard offers, with short-term rentals available from two weeks and the option to move to smaller or larger units without any transfer costs.

8.44 Users of the facility also have the opportunity to utilise the on-site business centre which provides flexible and affordable co-working and office space for SMEs.

Conclusion

8.45 The proposed development is therefore considered to make a significant contribution to the local economy with regards to direct and indirect employment opportunities.

8.46 This is in addition to the range of economic benefits the proposed facility will bring with it as outlined above including:

- Facilitates the growth of approx. 200 SMEs through the provision of small and affordable workspace;
- Offers a range of flexible and short-term leases to give individual customers and businesses the flexibility to use and operate the space how they see fit;
- Offers a 'mixed-use' approach through the provision of both self-storage facilities and the Business Centre allowing customers to operate in a range of ways;
- Generate 19 direct on-site employment opportunities representing an uplift of four direct employees;
- Indirect employment opportunities of **31-47** people opportunities allowing local business to prosper;
- Combined employment generation of **50-66** people;
- Other benefits include generation of employment during the construction phase, and an increase in consumer spending in the local economy.

8.47 It is therefore considered that the proposed self-storage (Use Class B8) use in this location is supported directly by Policy E4 of the London Plan given the proposed capacity would optimise the land in Use Class B8. This allows an opportunity to provide direct and indirect employment derived from the facility to benefit local businesses of a variety of sizes, including SMEs in accordance with Local Plan objectives.

9. PLANNING OBLIGATIONS STATEMENT (DRAFT HEADS OF TERMS)

- 9.1 This section sets out the draft Heads of Terms for the development and identifies where financial contributions could be made and where works 'in kind' are proposed in lieu of payment.
- 9.2 The National Planning Policy Framework published February 2023 states that in dealing with planning applications, local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations.
- 9.3 Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition. Planning obligations must only be sought where they meet all of the following tests:
- 9.4 All Section 106 obligations must pass the legal tests of regulation 122 of the Community Infrastructure Regulations.
- 9.5 The matters proposed for inclusion in the s106 agreement and with regard to the Council's Planning Obligations SPD (June 2020) are set out in below.
- Highways improvement
 - Footway improvements
 - Cycle improvements
 - Employment and skills training
 1. Local employment agreement
 2. Training and apprenticeships
 3. Managed workspace i.e., includes a wide range of features that limit the overhead and support micro/small businesses
- 9.6 Their inclusion in the S106 is subject to further viability discussions.

10. CONCLUSION

- 10.1 This Planning Statement has been prepared on behalf of Shurgard UK Ltd ('the applicant'), in support of a full planning application for the redevelopment of 74 Oldfield Road ('the Site').
- 10.2 The applicant seeks planning permission for the following development works ('the proposal'):
- “Demolition and redevelopment of the site to provide self-storage unit (Use Class B8) and business centre (Use Class E) with associated car and cycle parking, and land landscaping.”*
- 10.3 The planning statement and accompanying planning application documents demonstrate a wide range of benefits that the proposed development will offer to London Borough of Richmond Upon Thames. In addition, the proposal has been thoroughly assessed against national and local policy and accords with the key policy themes and policies. The proposed development will:
- Delivery of a minimum of 5,264 sqm and a maximum of 8,084 sqm of employment floorspace;
 - Provision of 170 sqm Business Centre (Use Class E (g)(i)) representing an uplift of 39.8 sqm;
 - The equivalent of 50-66 jobs, representing an uplift of 28-34 employment opportunities;
 - Enhanced building design including Secured by Design and a low carbon development/ high energy efficiency;
 - Creating and maintaining attractive, distinctive places; the scheme provides a high quality and sustainably constructed redevelopment proposal which would enhance the existing townscape;
 - Respect the amenity of neighbouring residents;
 - Tackling and adapting to climate change; the scheme seeks to enlist sustainable principles through construction and design whilst promoting ecological and green infrastructure enhancement on site;
 - Provide appropriate levels of car and cycle parking and promote sustainable transport within the area; and
 - Local CIL contributions and site specific S106.
- 10.4 It is considered that the proposed development is in accordance with relevant local and national planning policy guidance. It is further demonstrated that the proposal represents sustainable development, and is in accordance with national, London and Local planning policy and guidance. Further, the planning balance is in favour of the scheme in line with paragraph 11 of the NPPF.