

Planning Department
London Borough of
Richmond Upon Thames
44 York Street
Twickenham
TW1 3BZ

20 May 2024

Ref: FW323/FW

Dear Sir/Madam

63 Kew Road, Richmond TW9 2NQ – Ground Floor Rear

Application for Planning Permission – External alterations at ground floor level to the rear of the site to provide new outdoor amenity space (terrace), including alterations to the facade at ground floor level (new windows and door) and associated alterations including upgraded rear access, new lighting and seating and landscaping proposals

We write on behalf of our client, 63 Kew Road Limited, to submit a planning application for alterations to the rear of the existing building at 63 Kew Road in Central Richmond.

Planning permission is sought for:-

“External alterations at ground floor level to the rear of the site to provide new outdoor amenity space (terrace), including alterations to the facade at ground floor level (new windows and door) and associated alterations including upgraded rear access, new lighting and seating and landscaping proposals”

The objective of the proposed improvements is to provide additional amenity space for the existing office building. This is associated with the comprehensive refurbishment of ground floor of the building to significantly enhance the existing office offering. The new external amenity space will be an important benefit for office occupants/visitors whilst also enhancing the functionality of the building with a new business lounge proposed for the ground floor of the building.

The proposals are described in detail below.

This Planning Statement is accompanied by a full Design and Access Statement prepare by dna Architecture. This Statement also sets out the proposals in further detail and considers the proposals

in the context of the Central Richmond Conservation Area, in which it is located, in addition to assessing the potential impact the proposal may have on the Conservation Area and surrounding historic assets.

This Planning Statement will demonstrate that:-

- The proposed improvements are of a high quality design and are of a scale that respects the host building and those surrounding it;
- The proposed alterations are compatible with the site and will provide valuable new amenity floorspace that will improve the overall experience of office occupants;
- The proposed development will preserve the character and appearance of the Conservation Area being to the rear of the building and not visible from the public realm and there would be no adverse impacts heritage considerations;
- There are no adverse highways or amenity implications as a result of the proposals.

This Statement is set out as follows:-

- Site and surroundings
- Planning History
- The Proposed Development
- Planning Statement
 - Planning Policy Framework
 - Planning Policy Assessment
- Summary of Planning Considerations

The site and surroundings

The Application Site is located to the northern edge of Richmond's centre and to the north of Richmond Station. The building faces Richmond Circus roundabout and adjoins Twickenham Road (A316) to the north and Kew Road (A307) to the South.

63 Kew Road is an existing commercial office building consisting of circa. 30k sq ft of Grade A office space arranged over 4 storeys, ground to third floor. The reception is situated on the eastern edge of the site, facing Richmond Circus roundabout with offices either side, and floors above.

The original building was built in late 1980s and has undergone several updates in more recent years - 2013 facade updates, 2021 reception, entrance and amenities updates. All of these updates have allowed the office building to reposition itself as the commercial space adapts to an ever-changing market and tenant requirements.

The Application Site is located within the Central Richmond Conservation Area ('CRCA') – Conservation Area No 17. in the Royal Borough of Richmond upon Thames ('RBRT'). The building itself is not listed and does not constitute a building of townscape merit.

The Site is also located in a Key Office area.

The Richmond Central area is made up of predominantly commercial and retail properties. There are various building heights and architectural styles.

The proposal in this Planning Statement relates only to an external terrace area to the rear of a proposed business lounge that will occupy a portion of the ground floor office demise and external changes to the building facade.

The property is located in a highly sustainable location with Richmond Underground and Overground Station being located within a short walking distance, in addition to numerous bus routes and walking and cycling options.

Planning History

We have undertaken a review of the online Statutory Register of Planning Applications held by the Council and a number of applications have been made for alterations to the building and signage – some of which are listed below.

This demonstrates the extent to which the building is evolving and adapting to meet the changing requirements of office tenants.

| Application Reference | Description of Development |
|------------------------------|---|
| 93/1445/S192 | Replacement Of Existing Plywood Chevron Design Cladding Panels With Exterior Medite (mdf) Chevron Design Panels To Match Existing. Replacement Of Existing Clay Monoridge With New Lead Monoridge Detail. |
| 13/2874/FUL | Refurbishment of 63 Kew Road including elevational alterations, creation of 93 square metres (GIA) of office (Class B1) floorspace, secure cycle storage facility, access plant and associated works. Granted 13/12/13. |
| 14/3872/FUL | Installation of 2 new external comms room condensers at roof level. |
| 14/4664/FUL | Erection of non-illuminated signpost on private land outside main entrance and manifestation film to inside of ground floor level windows. Granted 06/01/15 |
| 14/4665/FUL | Erection of non-illuminated sign post on private land outside main entrance and manifestation film to inside of ground floor level windows. Granted 06/01/15 |
| 21/3161/FUL | Alterations to the eastern facade, alteration to main entrance to the building, including replacement of windows, a new ramp and planter wall. Demolition of shower block to the rear to be replaced by cycle storage. Removal of cycle stands. Granted 15/11/21. |

21/3162/ADV Internally illuminated signage on the eastern side of the building entrance in addition to the tower element of the building to illustrate the building address. Refused 15/11/21.

The Proposed Development

The proposal is for external improvements to the rear of the existing office building at 63 Kew Road (westerly elevation only) through the addition of a new rear terrace and building entry. The terrace will be located to the rear of a proposed internal business lounge that will occupy a portion of the existing ground floor office floorspace.

The space in which the extension works are proposed is currently used for car parking purposes and the car parking use will remain in situ albeit there will be a reduction of two car parking spaces to enable the creation of the terrace.

The existing door access will be replaced with a window and existing windows will be replaced with new bi-fold doors to the terrace.

The proposal also includes updates to the existing wall mounted exterior lighting to the car park, new low level and focused lighting within the proposed seating and landscaping improvements, alongside general improvements to the car park area.

The proposed description of development for planning permission is:

“External alterations at ground floor level to the rear of the site to provide new outdoor amenity space (terrace), including alterations to the facade at ground floor level (new windows and door) and associated alterations including upgraded rear access, new lighting and seating and landscaping proposals

Planning Statement

Planning Policy Framework

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.

National Planning Policy Guidance is produced by Central Government in the form of the National Planning Policy Framework (herein after referred to as the ‘NPPF’) adopted in July 2018 (revised in December 2023). This is a material consideration when determining planning applications.

The Statutory Development Plan comprises of regional policies with the Mayor’s London Plan (herein referred to as ‘LP’), adopted in March 2021 and at a local level the Local Plan includes the RBRT Local

Plan adopted by Council on 3 July 2018. The Local Plan 2018 is the key planning document for determining planning applications in Richmond.

RBRT Local Plan

Policy LP1 – Local Character and Design Quality

Policy LP3 – Designated Heritage Asset

Policy LP44 and 45 – Sustainable Transport Choices and Parking

The Central Richmond Conservation Area Appraisal (Conservation Area No.17) is also considered relevant to the proposal and is discussed in greater detail in the following sections of this Planning Statement.

Planning Policy Assessment

This section provides an assessment of the proposal against the relevant Local Plan policies and guidance listed above.

Design and Heritage Considerations

Design – Proposed Works

Planning Policy – High quality and inclusive design is encouraged by planning policy at national, regional and local levels.

The Government attaches great importance to the design of the built environment in the NPPF. Paragraph 131 states that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

Paragraph 135 supports that, inter alia, planning decisions should ensure developments:

- Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- Are sympathetic to local character and history, including the surrounding built environment and landscape setting;
- Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development, and support local facilities and transport networks.

Policy LP1 of the Local Plan ‘Local Character and Design Quality’ states that the Council will require all development to be of high architectural and urban design quality. Development proposals will need to

demonstrate a thorough understanding of the site and how it relates to its existing context, including character and appearance. The design should provide opportunities to improve the quality and character of buildings, spaces and the local area.

Part (1) is of particular relevance to this proposal stating that when assessing proposals and design there is a need to demonstrate *'compatibility with local character including the relationship to existing townscape, development patterns, views, local grain and frontages as well as scale, height, massing, density, landscaping, proportions, form, materials and detailing..'*

Planning Assessment - The design brief was to deliver an outdoor amenity space, open and accessible to all building users, utilising existing external space within the car park of the existing office building. This outdoor element forms part of two linked amenity interventions within the site, with the transformation of a small office demise into a Business Lounge internally, adjacent to the building's reception area.

The proposal provides the following design opportunities:

- Creation of a separate and screened terrace area within the curtilage of the existing car park;
- Creation of an outdoor amenity space which will be an extension of the new internal Business Lounge that is proposed;
- Improve the current entry arrangement into the building from the car park;
- Improve the presentation of the car park environment by refreshing the lighting, surface markings, landscaping and introducing natural screening.

The design is both respectful and contemporary and blends seamlessly into the previous upgrades that have been completed on the building since 2013 while delivering a bright and comfortable outdoor space for building users.

With regards to the building footprint and scale, the modest terrace will sit neatly in the existing car parking area at ground floor level. It will not change the scale of the existing building.

None of the proposed alterations to the building façade will visually dominate the existing building and the alterations are in scale with and are appropriate to the existing building and the surrounding area.

The design strategy addresses policy LP1 in the following ways:

- The alterations are confined to the rear of the office building and the small nature of the works dictates that they will not be visible from the surrounding streetscape. The terrace will only be visible from the car parking area or when looking out from the ground floor office areas;
- The proposal is relatively minor and will provide improved and enhanced external amenity space. It will not visually dominate the existing building and is of a scale and massing that is appropriate to the existing and surrounding building;

- The design and materials carefully reflect those of the existing buildings and will complement and modernise the existing building (see the heritage section below for more details with regards to the proposed materials);
- The proposal provides enhanced access and entry to the building;
- The proposal improves the landscaping appeal of the current lacklustre car parking area.

In addition, it is important to note that these alterations and improvements enable the creation of enhanced office space that meets the needs of modern office occupiers.

Given that there is a presumption against the loss of office floorspace under Policy LP41 and the Council strongly supports the local economy, the proposed enhancements to the existing office accommodation should be supported. These works fully uphold the Council's objectives to improve existing office space.

Given the above, it is considered that the proposed works proposed comply with the provisions of local and national planning policy as related to design and townscape.

Heritage - Impact upon the Conservation Area

Policy - Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that *'In the exercise, with respect to any buildings or other land in a conservation area...special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.'*

Furthermore Chapters 12 and 16 of the NPPF require great weight be placed on design quality and the preservation of designated heritage assets including their setting.

Paragraph 200 states when determining applications, *'local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance....'*

Paragraph 213 states that not all elements of a Conservation Area will necessarily contribute to its significance.

Locally, Policy LP3 relates to conservation areas and aims *'to conserve and, where possible, take opportunities to make a positive contribution to, the historic environment of the borough. Development proposals likely to adversely affect the significance of heritage assets will be assessed against the requirement to seek to avoid harm and the justification for the proposal. The significance (including the settings) of the borough's designated heritage assets, encompassing Conservation Areas, listed buildings, Scheduled Monuments as well as the Registered Historic Parks and Gardens, will be conserved and enhanced...'*

Part B (3) of the policy states that with regard to proposed works in Conservation Areas Council will *'Resist substantial demolition in Conservation Areas and any changes that could harm heritage assets unless it can be demonstrated that...*

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

In the Central Richmond Conservation Area Statement, there is no particular mention of the existing building with regards to special heritage considerations and the building is not identified as a building of townscape merit.

Planning Assessment - The existing building dates from the late 1980s and has undergone several updates in more recent years - 2013 facade updates, 2021 reception, entrance and amenities updates. All of these updates have allowed the office building to reposition itself as the commercial adapts to an ever-changing market and tenant demands.

Whilst the office building is located in the Central Richmond Conservation Area, the building is not identified as being a building of merit in the Conservation Area.

The Application Site is located in Character Area 2 of the CRCA – Parkshot. Parkshot is characterised by a mix of building types, including more modern development, and feels somewhat separate and quieter than the town centre.

The Conservation Statement notes that the building heights vary from two to five storeys and roof treatments vary in the area. In general, the greatest virtue and benefit of the existing townscape is that no one building dominates and that the larger buildings do not spoil the appearance of the centre.

Along the Kew Road the architecture worthy of notable mention relate to its three fine public houses, the Bull and Bush, The Duke of York and the Orange Tree. All these buildings make a positive contribution to the character and appearance of the Conservation Area, although two of the public houses have painted over the bright red brick façade.

Given the Application site's relatively recent construction and current design it can be assumed that the building is of a lesser importance in the context of the wider Conservation Area. The buildings current design features do not strongly reflect the historical architectural styles, materials and function found in the wider area.

Overall, it is considered that 63 Kew Road makes a neutral contribution to the CRCA. The building is located on the periphery of the Conservation Area and was built much later than the main part of Central Richmond. The building is a simple and fit for purpose office building, with no significance architecturally. Whilst it adds to overall townscape of Richmond Upon Thames it does not currently detract from it.

It is quite clear that the Conservation Area's significance is largely reflected in and by the properties located within and immediately around the core of Richmond Centre, not along the north eastern edge of the designation where the Application Site is located.

The drawings submitted as part of the application package illustrate how the proposals have been designed so as to be sympathetic to the overall character and appearance of the existing building and surrounding context of the Townscape and Conservation Area.

The proposed alterations are to the rear of the site and do not have an impact on the wider conservation area or townscape. The overall appearance, as an office building, will remain and the street facing elevation will remain unchanged.

Heritage Conclusions/Assessment of Impact - The relationship between the Application Site and the Conservation Area is maintained and the character and appearance of the Conservation Area will be fully preserved as a result of the proposals which are compatible with the existing office building, improving the access, legibility and purpose of the existing office building.

The proposed rear alterations are modest in nature and will not cause any harm particularly given its location in the existing car parking area and away from street views.

As the Conservation Area Appraisal states, there is no distinctive local vernacular of 63 Kew Road and *the building or structure can be considered to make no positive contribution to the character or distinctiveness of the area.* As the proposal does not detract from the existing appearance and fabric of the Application Site it can therefore be concluded that no harm is caused to the Conservation Area as a result of the proposals. The application can be considered to meet relevant policy and guidance and the recommendation considered to be in line with the statutory duty set out above.

Other matters

Highways and Parking - The proposals result in the loss of two car parking spaces. Policy LP45 relates to Parking Standards and Servicing.

The objective of the policy is to minimize the impact of car based travel and car parking standards are based upon London Plan Standards where car free development is the starting point and parking provision is set as a maximum rather than minimum. The proposal will retain EV charging spaces for 9 car parking spaces and one disabled parking space will be retained but relocated so that it is close to the new sloped access.

It is not considered that there are any highways reasons why planning permission should not be granted.

Amenity - There will be no impact on the amenity of surrounding buildings as a result of the proposals.

Landscaping – The proposals introduce greening and enhanced landscaping to this part of the building with associated biodiversity benefits.

Conclusions

Planning permission is sought for a small area of external terrace in the existing car park to provide additional amenity floorspace and an improved occupier experience at ground floor level for the office occupiers, alongside improved building access, changes to the building facade at ground floor level to complement the new terrace and improved landscaping.

As set out above, the proposed modifications to the facade have been sensitively designed in the context of the Conservation Area to both enhance the tired facade currently fronting the car parking area of the building and improve access to a new internal business lounge at ground floor and the building as a whole.

The chosen materials and detailing of the alterations respect and enhance the existing office building and the character and appearance of the surrounding area. There will be no visual impact as a result of the proposal at street level.

Overall, it is clear that the proposed external terrace will enhance the functionality and offer of the building for the office workers providing high quality, improved office floorspace.

The proposals are considered to uphold the statutory duties in relation to the conservation area and to comply with the provisions of National, Regional and local policies relating to design and heritage.

There are no adverse impacts upon highways and parking or amenity of surrounding buildings.

Additional Information

Application Documentation

The application is submitted via the Planning Portal (Ref: PP – 13068196)

This submission contains the following documents:-

1. Completed application form;
2. Covering letter (Planning Statement)
3. Design and Access Statement
4. Site location plan
5. Existing plans and elevations
6. Proposed plans and elevations

We look forward to receiving confirmation that this application submission has been received and validated and if you have any further queries please contact Faye Wright of this office on 07812 140 099.

Yours faithfully

Forward Planning and Development

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