

Application reference: 24/0850/FUL TWICKENHAM RIVERSIDE WARD

| Date application received | Date made valid | Target report date | 8 Week date |
|---------------------------|-----------------|--------------------|-------------|
| 03.04.2024 | 17.04.2024 | 12.06.2024 | 12.06.2024 |

Site:

10 Orleans Road, Twickenham, TW1 3BL,

Proposal:

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

Status: Pending Decision (If status = HOLD please check that all is OK before you proceed any further with this application)

APPLICANT NAME

Jacqui Norris
C/O Agent

AGENT NAME

George Voss
The Boathouse Design Studio
27 Ferry Road
Teddington
TW11 9NN

DC Site Notice: printed on 22.04.2024 and posted on 03.05.2024 and due to expire on 24.05.2024

Consultations:

Internal/External:

Consultee

14D POL
14D Urban D
LBRUT Transport

Expiry Date

06.05.2024
06.05.2024
06.05.2024

Neighbours:

34 Godstone Road, Twickenham, TW1 1JX -
77 Amyand Park Road, Twickenham, TW1 3HG -
4 Montpelier Row, Twickenham, TW1 2NQ -
20 Orleans Rd, Twickenham, TW1 3BL -
24 Orleans Road, Twickenham, TW1 3BL, - 22.04.2024
22 Orleans Road, Twickenham, TW1 3BL, - 22.04.2024
20 Orleans Road, Twickenham, TW1 3BL, - 22.04.2024
26 Orleans Road, Twickenham, TW1 3BL, - 22.04.2024
27 Orleans Road, Twickenham, TW1 3BJ, - 22.04.2024
2A Chapel Road, Twickenham, TW1 2NG, - 22.04.2024
2 Chapel Road, Twickenham, TW1 2NG, - 22.04.2024
12 Orleans Road, Twickenham, TW1 3BL, - 22.04.2024
18 Orleans Road, Twickenham, TW1 3BL, - 22.04.2024
16 Orleans Road, Twickenham, TW1 3BL, - 22.04.2024
Glebe Cottage, 14 Orleans Road, Twickenham, TW1 3BL, - 22.04.2024
29 Orleans Road, Twickenham, TW1 3BJ, - 22.04.2024
The Old Chapel, Orleans Road, Twickenham, TW1 3BJ, - 22.04.2024
8D Orleans Road, Twickenham, TW1 3BL, - 22.04.2024
1 Chapel Road, Twickenham, TW1 2NG, - 22.04.2024

History: Development Management, Appeals, Building Control, Enforcements:

Development Management

Status: PDE

Application: 24/0850/FUL

Date:

Change of use of the building from vacant commercial use to two dwellings

plus external alterations.

Enforcement

Opened Date: 11.10.2007 Enforcement Enquiry

Reference: 07/0450/EN/UBW

| | |
|---------------------------|-------------------------------------------------------------------------------------------------------------|
| Application Number | 24/0850/FUL |
| Address | 10 Orleans Road, Twickenham, TW1 3BL |
| Proposal | Change of use of the building from vacant commercial use to two dwellings plus external alterations. |
| Contact Officer | Kerry McLaughlin |

1. INTRODUCTION

This application is of a nature where the Council's Constitution delegates the authority to make the decision to Officers rather than it being determined by the Planning Committee.

Before preparing this summary report the planning officer has considered any relevant previous planning applications in relation to the development and considered any comments made by those interested in the application such as consultees with specialist knowledge and nearby residents.

By indicating that the development proposal complies with relevant Local Plan Policies, the planning officer is taking into account the information submitted with the application, any previous relevant applications, any comments received in connection with the application and any other case specific considerations which are material to the decision.

2. DESCRIPTION OF THE SITE AND ITS SURROUNDINGS

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

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

The site is subject to the following planning constraints:

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

In the immediate surrounds, the adjacent terrace at 12-24 Orleans Road are designated Buildings of Townscape Merit, as is the Old Chapel, Orleans Road opposite. 14 and 15 Montpelier Row on the opposite side of Chapel Road are Grade II* listed.

3. RELEVANT PLANNING HISTORY

The comprehensive list of planning history can be found above however the most relevant planning history is as follows:

| Ref | Proposal | Decision |
|-----------------|---------------------------------------------------------------------------------------|-----------------|
| 23/P0016/PREAPP | Conversion of existing building to 2 residential homes. Follow up to 22/P0192/PREAPP. | Advice Provided |
| 22/P0192/PREAPP | Conversion of existing building to 2 residential homes. | Advice Provided |

4. CONSULTATIONS CARRIED OUT

The list of neighbours notified of this application are listed above.

5 letters of objection have been received. These comments are summarised as follows:

- The external alterations would remove the buildings character.
- Residential use would be best achieved by conversion to one dwelling rather than squeezing two properties out of the available space. This would allow a more pleasing building design more attune to the Conservation Area; less windows, no need for two front doors etc.
- No details on refuse storage.
- The proposed conversion to two residential buildings would constitute an overdevelopment of the site.
- Car parking and traffic concerns.
- The building is wholly unsuitable for residential use.
- Lack of private amenity space.
- Quality of internal living environment.
- Lack of dedicated refuse and cycle storage.
- There is no marketing evidence - The submitted Report is for an entirely different property across the road (i.e. the Old Chapel). Despite photos of the application property in the particulars section of the Report, it is clear that the remainder of the Report is concerned with The Old Chapel.
- Design and Appearance, and Heritage Impacts
- Adverse Impacts to Neighbouring Property - It is proposed to raise the height of the building on the boundary by approx. 600m. In itself this may not seem like much but considering the existing boundary / party wall is already approx. 3.9m high, the proposed increase is significant (it equates to an approx. 15% increase in height).
- Lack of detail within the Construction Management Plan.

Neighbour amenity considerations are assessed under Section 7 in the report below.

A letter of concern has also been received from councillor Julia Neden-Watts (Twickenham Riverside ward councillor), requesting that the application be referred to the Planning Committee for determination in the event of an officer recommendation of approval. This letter is summarised as follows:

- Private outside space
- Car Parking
- Cycle Storage
- Waste Storage
- Concern around the "upside down" living arrangement proposed in one of the dwellings noting that the windows front directly onto the street.

5. AMENDMENTS

None.

6. MAIN POLICIES RELEVANT TO THE DECISION

NPPF (2023)

The key chapters applying to the site are:

- 4 - Decision-making
- 5 - Delivering a sufficient supply of homes
- 9 - Promoting sustainable transport
- 11 - Making effective use of land
- 12 - Achieving well-designed places
- 16 - Conserving and enhancing the historic environment

These policies can be found at:

https://assets.publishing.service.gov.uk/media/65819679fc07f3000d8d4495/NPPF_December_2023.pdf

London Plan (2021)

The main policies applying to the site are:

- D4 - Delivering good design
- D5 - Inclusive Design
- D6 - Housing quality and standards
- D7 - Accessible Housing
- D12 - Fire Safety
- H1 - Increasing housing supply
- H2 - Small Sites
- H4 - Delivering affordable housing
- HC1 - Heritage conservation and growth

G7 - Trees and woodlands
 S12 - Minimising Greenhouse Gas Emissions
 T5 - Cycling
 T6 - Car parking

These policies can be found at: <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan-2021>

Richmond Local Plan (2018)

The main planning considerations applying to the site and the associated Local Plan policies are:

| Issue | Local Plan Policy | Compliance | |
|---------------------------------------------------------------|-------------------|------------|----|
| Local Character and Design Quality | LP1 | Yes | No |
| Designated Heritage Assets | LP3 | Yes | No |
| Views and Vistas | LP5 | Yes | No |
| Archaeology | LP7 | Yes | No |
| Amenity and Living Conditions | LP8 | Yes | No |
| Local Environmental Impacts, Pollution and Land Contamination | LP10 | Yes | No |
| Trees, Woodland and Landscape | LP16 | Yes | No |
| Climate Change Adaptation | LP20 | Yes | No |
| Flood Risk and Sustainable Drainage | LP21 | Yes | No |
| Sustainable Design and Construction | LP22 | Yes | No |
| Water Resources and Infrastructure | LP23 | Yes | No |
| Waste Management | LP24 | Yes | No |
| New Housing | LP34 | Yes | No |
| Housing Mix and Standards | LP35 | Yes | No |
| Affordable Housing | LP36 | Yes | No |
| Industrial Land and Business Parks | LP42 | Yes | No |
| Sustainable Travel Choices | LP44 | Yes | No |
| Parking Standards and Servicing | LP45 | Yes | No |

These policies can be found at

https://www.richmond.gov.uk/media/15935/adopted_local_plan_interim.pdf

Richmond Publication Local Plan (Regulation 19 version)

The Richmond Publication Version Local Plan (Regulation 19 version) and its supporting documents, including all the Regulation 18 representations received, was considered at Full Council on 27 April. Approval was given to consult on the Regulation 19 Plan and, further, to submit the Local Plan to the Secretary of State for Examination in due course.

The Publication Version Local Plan, including its accompanying documents, have been published for consultation on 9 June 2023. Together with the evidence, the Plan is a material consideration for the purposes of decision-making on planning applications.

The weight to be given to each of the emerging policies and allocations will depend on an assessment against the criteria set out in paragraph 48 of the NPPF. As the Council considers the emerging Local Plan to be sound and legally compliant, officers and Councillors should accord relevant policies and allocations weight in the determination of applications taking account of the extent to which there are unresolved objections to relevant policies. Note that it was agreed by Full Council that no weight will be given to Policy 4 in relation to the increased carbon offset rate, and therefore the existing rate of £95 will continue to be used; in addition, no weight will be given to Policy 39 in relation to the 20% biodiversity net gain requirement; all other aspects and requirements of these policies will apply.

Overall, the weight afforded to each policy at this stage will differ depending on the nature of representations received to that policy. Where relevant to the application under consideration, this is addressed in more detail in the assessment below.

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| Issue | Local Plan Policy | Compliance | |
|------------------------------------|-------------------|------------|----|
| Local Character and Design Quality | LP28 | Yes | No |
| Designated Heritage Assets | LP29 | Yes | No |
| Views and Vistas | LP31 | Yes | No |

| | | | |
|---------------------------------------------------------------------------------------------|------|-----|----|
| Archaeology | LP33 | Yes | No |
| Amenity and Living Conditions | LP46 | Yes | No |
| Local Environmental Impacts | LP53 | Yes | No |
| Trees, Woodland and Landscape | LP42 | Yes | No |
| Minimising Greenhouse gas emissions and promoting energy efficiency | LP4 | Yes | No |
| Sustainable Construction Standards | LP6 | Yes | No |
| Water Resources and Infrastructure | LP9 | Yes | No |
| Waste and the circular economy | LP7 | Yes | No |
| New Housing | LP10 | Yes | No |
| Housing Mix and Standards | LP13 | Yes | No |
| Affordable Housing | LP11 | Yes | No |
| Industrial Land | LP24 | Yes | No |
| Sustainable Travel Choices | LP47 | Yes | No |
| Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management | LP48 | Yes | No |

These policies can be found at https://www.richmond.gov.uk/draft_local_plan_publication_version

Supplementary Planning Documents

Affordable Housing
Buildings of Townscape Merit
Design Quality
Refuse and Recycling Storage Requirements
Residential Development Standards
Sustainable Construction Checklist
Development Control for Noise Generating and Noise Sensitive Development
Transport
Richmond and Richmond Hill Village Plan

These policies can be found at:

https://www.richmond.gov.uk/services/planning/planning_policy/local_plan/supplementary_planning_documents_and_guidance

Other Local Strategies or Publications

Other strategies or publications material to the proposal are:

Community Infrastructure Levy
Twickenham Riverside Conservation Area Statement
Twickenham Riverside Appraisal
Nationally Described Space Standards

Determining applications in a Conservation Area

In considering whether to grant planning permission with respect to any buildings or other land in a conservation area, Section 72 of the Planning (Listed buildings and Conservation Areas) Act 1990 requires that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of the Conservation Area. In this context, "preserving", means doing no harm.

To give effect to that duty, decisions of the court have confirmed that for development proposed to be carried out in a conservation area, a decision-maker should accord "considerable importance and weight" to the desirability of preserving or enhancing the character or appearance of the conservation area, when weighing this factor in the balance with other material considerations which have not been given this special statutory status. This creates a strong presumption against granting planning permission where harm to the character or appearance of a conservation area is identified. The presumption can be rebutted by material considerations powerful enough to do so.

In applications where the decision-maker is satisfied that there will be no harm to the character or appearance of a conservation area, the statutory presumption against granting planning permission described above falls away. In such cases the development should be permitted or refused in accordance with the policies of the development plan and other material considerations.

7. EXPLANATION OF OFFICER RECOMMENDATION

The key issues for consideration are:

- i Principle of Development

| | |
|------|-----------------------|
| ii | Design/Visual Amenity |
| iii | Neighbour Amenity |
| iv | Residential Standards |
| v | Affordable Housing |
| vi | Sustainability |
| vii | Transport and Parking |
| viii | Refuse and Recycling |
| ix | Trees |
| x | Views and Vistas |
| xi | Archaeology |
| xii | Flood Risk |
| xiii | Biodiversity |
| xiv | Contamination |

Note: There appear to be some inconsistencies within the submitted drawings. For instance:

- the proposed east and west elevations depict an increase in ridge height which exceeds the height of the end gable walls but this is not depicted on the north or south elevations.
- Proposed section AA and BB illustrates that the eaves height of the eastern elevation would be increased but this is not illustrated on the proposed southern elevation.
- The roof plan illustrates two rooflights and a further feature on the eastern roofslope. No section drawing has been provided illustrating what that feature may be and the proposed eastern elevation does not clarify this with any annotation. It is understood that this is likely to be a rooflight from the image on p27 of the D&A.

Had the application been otherwise acceptable, updated drawings would have been sought.

Issue i - Principle of Development

London Plan Policy E2 (Providing suitable business space) states that boroughs should include policies that support the provision, and where appropriate, protection of a range of B Use Class business space, in terms of type, use and size, at an appropriate range of rents, to meet the needs of micro, small and medium-sized enterprises, and to support firms wishing to start-up or expand. Policy E4 (Land for industry, logistics and services to support London's economic function) states that boroughs should provide a sufficient supply of land and premises to meet current and future demands for industrial and related functions, including storage and logistics/distribution.

Policy LP 40 in the Local Plan states that the Council will support a diverse and strong local economy by retaining land in employment use for business, industrial or storage purposes. The provision of small units, affordable units and flexible workspace such as co-working space is encouraged.

Policy LP 42 includes a presumption against the loss of industrial land in all parts of the borough. Loss of industrial space outside of the locally important industrial land and business parks will only be permitted where evidence is provided that demonstrates that there is no longer demand for an industrial based use in this location and there is not likely to be in the foreseeable future. This must include evidence of completion of a full and proper marketing exercise of the site at realistic prices both for the existing use or an alternative industrial use completed over a minimum period of two continuous years in accordance with the approach set out in Appendix 5 of the Local Plan. Following this, a sequential approach to the redevelopment or change of use is applied that prioritises redevelopment for office or alternative employment uses including social or community infrastructure uses, followed by maximum provision of affordable housing.

The employment policies in the Publication Local Plan continue to take a protectionist approach to industrial land. Policy 24 states that there is a presumption against the loss of industrial land in all parts of the borough and that proposals which result in a net loss of industrial land will be refused and that any redevelopment proposals are required to contribute to a net increase in industrial floorspace. Marketing information will be considered as a material consideration, but will not in itself justify an exception to policy.

The proposal seeks to change the use of the currently vacant warehouse (B8 use) at 10 Orleans Road, by splitting it into two self-contained residential dwellings (C3 use). As such there is an in-principle objection for the change of use from industrial use of the premises to residential. The applicant was advised at pre-application stage that should this scheme be pursued "robust evidence demonstrating the above has been undertaken and is unviable will be required. The applicant will be required to provide marketing evidence and undertake a sequential test."

A Marketing Report by Michael Rogers dated 21st November 2023 has been submitted with this application. It is stated that the property was put on the market in December 2020 offering short or long term flexible basis and a freehold basis.

The marketing campaign commenced in December 2020 and is ongoing. Marketing activities/evidence includes:

- Marketing board
- Mailing: in-house mailing list of over 1,000 companies. Mailing list of some 1,500 companies also purchased, and local occupiers targeted.
- Social media
- Sales particulars (attached - freehold offers invited in excess of £650,000 excl. VAT/to rent - offers invited).
- Listings on various property databases (including Zoopla, Estates Gazette Interactive, Loopnet, Prime Location, EACH, etc).

An availability schedule showing nearby property availability is available in the appendices of the Marketing Report. However, the majority of the properties listed are in office use and given the current B8 use few details have been submitted of local comparable sales and lettings for warehouse/industrial/storage uses, and there are also no details of what rents and flexible terms were offered/sought (only the freehold sale price). Therefore, it has not been possible to determine whether the property has been marketed at a price that genuinely reflects the market value of the property in its current form. This is particularly important as recent evidence (Employment Land and Premises Needs Assessment 2021, updated in 2023) has shown that there is an ongoing shortfall in the availability of industrial land in the borough.

The Marketing Report states that during the marketing period, the site was viewed by 22 parties and received no offers. A schedule of enquiries attached to the report identifies interested parties and reasons why the premises were rejected. The first enquiry was in December 2020 with the most recent being November 2023. Feedback from interested parties is predominantly related to the size of the property, wrong location, inaccessibility, ceiling heights, lack of natural light and a desire for residential development instead. The Marketing Report states no significant interest was received apart from a local retailer who wanted to use the accommodation for a staff chill out area.

If it is accepted that a full and proper marketing exercise of at least two years has been undertaken LP 42 then requires a sequential approach to redevelopment or change or use to be applied as follows:

- a. Redevelopment for office or alternative employment uses.
- b. Mixed use including other employment generating or community uses, and residential providing it does not adversely impact on the other uses and maximises the amount of affordable housing delivered as part of the mix.

The Planning Statement discusses the sequential approach. In regards office uses, the Planning Statement concludes office uses are inappropriate on this site due to the reasons highlighted by interested parties above but also due to its out of centre / Key Office Area location, and potential car trips generated by an office use with limited parking.

Regarding other employment generating or community uses, the Planning Statement states that social and community infrastructure uses are deemed inappropriate for similar reasons as discussed above. The applicant has considered the Council's latest Infrastructure Delivery Plan (2023), particularly the need for healthcare provision, primary school capacity and library uses. It is also evident from the enquiry schedule that other employment generating, and social/community uses have been explored (e.g. gyms, hairdressing training school, nurseries, clinics).

The Planning Statement also concludes that a mixed-use scheme would be inappropriate in this location due to the above consideration of office and other employment generating uses including social and community infrastructure uses.

It is recognised that the applicant has attempted to explore different options for accommodating alternative employment uses on the site, including office and social or community uses, however, it is not considered that robust and compelling evidence has been submitted to show that a continued industrial use is completely unviable at this site, as required by LP 42.

The supporting text to LP 42 states that: "In the borough context it is common for employment, particularly industrial sites to be within established mixed use or residential areas, because of historic development patterns. This does not provide justification for a change of use, as mitigation can address impacts and constraints such as narrow access, which have been managed by existing occupiers, and therefore do not prevent any future or continued employment use."

Overall, given the long-term historical use of the site, deficiencies in industrial land in the borough, lack of clarity on rental prices/terms and comments from interested parties referred to in the Marketing report, it is unclear that the evidence fully justifies the release of industrial land or why the possibility of upgrading the

premises to make it more desirable for another industrial occupier or other commercial occupiers has not been explored further before considering a wholly residential proposal.

Policy LP 42 also requires the amount of affordable housing delivered to be maximised, affordable housing is assessed under 'issue v' below.

Issue ii - Design/Visual Amenity

Policy LP 1 of the Local Plan outlines that the Council will require all development to be of high architectural and urban design quality. The high-quality character and heritage of the borough and its villages will need to be maintained and enhanced where opportunities arise. Development proposals will have to demonstrate a thorough understanding of the site and how it relates to its existing context, including character and appearance, and take opportunities to improve the quality and character of buildings, spaces and the local area.

Policy LP3 of the Local Plan 2018 covers Designated Heritage Asset and states that proposals should conserve and take opportunity to make positive contribution to the historic environment such as retaining and preserving the original structure, layout, architectural features and materials or reinstatement of heritage assets. Appropriate materials and techniques should be used. There is a requirement to seek to avoid harm or justify for loss and demolition will be resisted. The significance of the asset is taken into consideration when assessing works proposed to a designated heritage asset.

The application site lies within the Twickenham Riverside Conservation Area (CA) no.8. The Twickenham Riverside CA draws its significance from an intrinsic relationship with the 'Arcadian Thames', including grand development from the 18C and their contrast with small-scale domestic and light industrial architecture of a varied richness. The complementary architecture and scale of 10 Orleans Road makes a strong contribution to the character, appearance and significance of the CA. The Area Appraisal recognises its contribution to the setting of The Old Chapel opposite.

This single storey building with its simple architectural features dates from the latter part of the 19th century. It is marked on current maps as a works building (formerly a garage) but may have originally been a school (as indicated on the 1895-98 county survey).

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

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

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

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

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

12-24 Orleans Road comprises a well-preserved early-to-mid 19C two-storey stock brick terrace with parapet concealing 'butterfly' roofs behind generous and verdant front gardens providing relief to the intimate enclosure of the street. They draw significance from a well-preserved historic setting of similar small scale, tight-knit urban grain and are Buildings of Townscape Merit. The significance of the Old Chapel opposite derives from its more picturesque Neo-Gothic composition with detailing in stone and polychromatic brick emblematic of its civic-ness as the former Montpelier Chapel School. Despite forming a rather abrupt bookend to the terrace, the form, scale and architecture of the site makes an overall positive contribution to a palpably historic environment comprising their setting.

14-15 Montpelier Row are outstanding early London brick terraces with red brick trimmings and strong historical associations. Their setting facing Marble Hill Park, substantial verdant rear gardens and a

complementary lower scale workmanlike historic setting to the rear make a moderate contribution to significance. The two-storey garden studio opposite the site is considered curtilage listed making a strong contribution to significance.

The application is not accompanied by a rigorous dedicated Heritage Assessment, which considers in detail the historical development of the site, its architecture and setting.

It is proposed to split the building in half to form two dwellings. A new entrance would be formed on the north elevation for one of the units where there is currently a window, the existing door would be used for the other unit. The first-floor window in the end gable facing Chapel Road would be enlarged, as well as the replacement and enlargement of the ground floor windows along the western elevation and 4 front half dormers would be added - two for each house.

The roof extension would lift the existing eaves, leaving a series of prominent, awkward and presently unresolved details and junctions. This includes the treatment of the new eaves, the raking parapet gable ends and drainage.

The proposal would result in the significant alteration and loss of historic fenestration, opening-up, dropping cills and wholesale replacement of historic joinery all of which contribute positively to the character of the host building. The latter would be replaced by deep-inset timber window units set flush with the wall plane, in-of-themselves not potentially unattractive, but in stark contrast with their host and well-preserved setting and their junctions. The prominent dormers would weigh uncomfortably on the retained apertures, failing to be subservient by breaking through the eaves and dominating the recessive roof of their host. Their splayed, deep relief, quantum, spacing and size, in addition to the other enlarged fenestration, would appear unduly prominent and would dominate the host dwelling. Overall, it is considered the significant modern interventions would impose a stark new character within the carcass of the historic shell. The scheme would result in a much altered building and the loss of original features and proportions.

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

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

Harm, arising from a diminishment in the site's complement to the palpable historic environment, would result in a negligible impact on the contribution of this setting to the significance of 14-15 Montpelier Row, whose boundary wall and outbuilding would be appreciated in tandem with the site opposite from Orleans and Chapel Road. This harm would be less than substantial in NPPF parlance.

Paragraph 202 of the NPPF states 'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal'. In this instance, whilst the additional dwellings are afforded weight in contributing to the housing stock the value of this is negated by the loss of industrial land which is not fully justified and in combination with other factors in the planning balance overall, there insufficient public benefit arising from the proposal as such it is contrary to the NPPF.

Harm would be caused to the character, appearance and significance of the CA and the special interest/significance of 14-15 Montpelier Row (Grade II*), both matters of considerable importance and weight, contrary to LP 3 and HC1. It is considered this would not be outweighed by commensurate wider public benefit contrary to the NPPF (para 208). Harm by way of the contribution of setting would also be caused to The Old Chapel and 12-24 Orleans Road as Buildings of Townscape Merit / non-designated heritage assets, contrary to LP4. It is not considered the benefits would outweigh the harm contrary to guidance in the NPPF (para 209). Overall, the proposal would not constitute high quality design and would detract from local character, contrary to LP 1, LP3, LP4 and D3 as well as Publication Local Plan policies 28, 29 and 30.

Issue iii - Neighbour Amenity

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

. The building would maintain the existing footprint . External manifestations comprise; façade and fenestration alterations, along with front dormer roof extensions. The ridge height would be increased and it appears that the eaves height on the eastern and western elevations would be increased, although as set out above, there are inconsistencies on the submitted drawings such that there is a lack of clarity in the submission.

The eastern elevation adjoins no 1 Chapel Road. This is understood to be a four-bedroom dwellinghouse. The nearest ground floor window appears to serve a dual aspect kitchen, which also benefits from a side window and door within the outrigger. The first-floor rear elevation window serves an en-suite. The rear garden to this property is substantially enclosed by the existing flank wall of the application site along the entire side boundary, the two storey flank elevation of 12 Orleans Road across approx. half of the rear boundary, and a rear extension with first floor terrace and associated balustrades at 2/2A Chapel Road. The scheme would result in the increase in height of the boundary wall from approx. 3.7m to approx. 4.4m-4.5m (measurements vary slightly between the proposed eastern elevation and proposed section AA). Whilst this may not have a materially harmful impact on outlook to the kitchen and bathroom windows by virtue of the dual aspect and non-habitable nature respectively, it will result in a harmful degree of further enclosure to the rear garden.

Images of rear garden (publicly available and sourced from Rightmove):



Furthermore, the kitchen window affected faces in a southerly direction whereas the alternative window is not within 90 degrees of due south. As such, it is the affected window which provides for sunlight to this habitable room. In the absence of a BRE assessment, the applicant has failed to demonstrate that there will not be a materially harmful impact on light to this room.

12 Orleans Road sits to the south-east of the site. Although the increase in height would be visible, given the relative orientation of this property, separation distance and oblique viewing angle it is not considered that the increase in massing would be visually intrusive, overbearing or cause loss of light to this property.

In regard to the front dormers, given siting, high vantage point and relationship to neighbouring habitable rooms and gardens, the scheme would not lead to an unacceptable sense of enclosure or appear overbearing, nor would there be any significant loss of daylight or sunlight to the habitable rooms of neighbouring properties.

With regard to the proposed fenestration to the north and west elevations, both elevations face onto the public highway (Orleans Road and Chapel Road), whilst it is noted there is an increase in the overall size of the openings/glazed areas, the proposal will not result in any new onerous viewing angles above that which can already be achieved through the existing fenestration. This is also likewise with the south elevation, which faces onto the front gardens of the neighbouring properties along Orleans Road.

The proposed rooflights along the eastern elevation are in excess of 1.7m from the relevant floor level, thus will not result in an increase in overlooking or raise any issues with regard to privacy to the neighbours along Chapel Road.

The surrounding area is dominated by residential uses. As such an undue increase in noise or pollution would not occur as a result of the new residential use.

The proposed scheme is considered acceptable in terms of neighbour amenity. The proposal is not considered to detrimentally impact the amenities of any neighbouring occupiers and therefore, is in line with policy LP8 of the Local Plan (2018) and relevant Supplementary Planning Documents/Guidance.

The proposal would by reason of its siting, depth and height, in the absence of adequate information on impact on light and clarity on the submitted drawings, would result in a dominant, overbearing and visually intrusive form of development, which would create an unacceptable sense of enclosure to the private amenity space of

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the adjacent neighbouring property at no. 1 Chapel Road and fails to demonstrate that there would not be a harmful loss of light, detrimental to the amenities of the occupants thereof. The development is thereby contrary to the aims and objectives of the NPPF [2023], Policy LP8 of the Local Plan [2018] and Policy 46 of the Publication Local Plan.

Issue iv - Residential Standards

Part B of LP 35 sets out that all housing developments including conversions are required to comply with the Nationally Described Space Standards.

The proposal property is over two floors. The gross internal area of the building exceeds NDSS requirements.

| | Unit A | Unit B |
|-------------------|---------|---------|
| GIA Required | 79 sqm | 79 sqm |
| GIA Best Practice | 86 sqm | 86 sqm |
| GIA Proposed | 102 sqm | 100 sqm |

In terms of residential room sizes, the proposals will provide sufficient internal spaces to meet the minimum room sizes set out in the SPD.

| The standard requires that: | Officer Comments |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|
| b. a dwelling with two or more bedspaces has at least one double (or twin) bedroom | Compliant |
| c. in order to provide one bedspace, a single bedroom has a floor area of at least 7.5m ² and is at least 2.15m wide | Not Applicable |
| d. in order to provide two bedspaces, a double (or twin bedroom) has a floor area of at least 11.5m ² | Complies |
| e. one double (or twin bedroom) is at least 2.75m wide and every other double (or twin) bedroom is at least 2.55m wide | Complies |
| f. any area with a headroom of less than 1.5m is not counted within the Gross Internal Area unless used solely for storage (if the area under the stairs is to be used for storage, assume a general floor area of 1m ² within the Gross Internal Area) | Complies |
| g. any other area that is used solely for storage and has a headroom of 900-1500mm (such as under eaves) is counted at 50% of its floor area, and any area lower than 900mm is not counted at all | Complies |
| h. a built-in wardrobe counts towards the Gross Internal Area and bedroom floor area requirements, but should not reduce the effective width of the room below the minimum widths set out above. The built-in area in excess of 0.72m ² in a double bedroom and 0.36m ² in a single bedroom counts towards the built-in storage requirement | Complies |
| i. the minimum floor to ceiling height is 2.3m for at least 75% of the Gross Internal Area. Note, The London Plan requires 2.5m. | Complies |

In terms of outlook and light for residents, both homes are dual aspect and all habitable rooms are served with windows which will provide adequate daylight and outlook for each room.

The Residential Development Standards SPD (2010) requires a minimum of 5 m² of private outdoor space be provided for 1-2 person dwellings, plus an extra 1m² should be provided for each additional occupant. The scheme fails to provide sufficient private outdoor amenity space for the occupiers of the proposed dwelling. The existing building covers the full extent of the site which makes providing external private amenity space difficult. However, the lack of private amenity space is offset by the close proximity of Marble Hill Park, for which the entrance is located <150m away from the site. As such, the lack of private outdoor amenity space, in this instance, does not justify a reason for refusal.

Inclusivity

Paragraph 9.2.7 of policy LP35 states “Unlike the other standards in this policy, Part M of the Building Regulations generally does not apply to dwellings resulting from a conversion or a change of use.” As such part M of the building regulations does not apply to this scheme.

Issue v - Affordable Housing

Policy LP 36 (Reg 19 Local Plan Policy 11) requires contributions for affordable housing from all small sites on a gross basis, further details are set out in the Affordable Housing SPD.

The contribution that would be sought, given the type of site and number of dwellings proposed would be 20% affordable housing due to the loss of employment floorspace. The applicant has provided an estimated commuted sum as part of the submitted Financial Viability Assessment submitted, which included a commuted sum of £229,630 and was based on the correct affordable housing percentage of 20%. The information submitted also included information on property comparables in close proximity to the application site.

The information provided with the application has been passed on to the Council's Planning Viability Advisor to review. Within the assessment from the Council's Planning Viability Advisor, they have reviewed the proposed commuted sum using the pro-forma Annex A to the SPD. The Council's Planning Viability Advisor has provided an assessment of recent sales of 2 bed properties, with 7 suitable comparable properties for sale within 0.25m of the site. The comparables for 2 bed houses included an average sale price of £10,259/m², which is equivalent to an Open Market Value (OMV) of £1,046,418 based on a GIA of 102m² as included within the submitted application form. However, the Council's Planning Viability Advisor accepts based on the location and sizes of the properties there would be a ceiling price in this area. Therefore, they have capped the values at £999,500, this value is then not dissimilar to the applicants assumed OMV of £950,000 for each proposed dwelling. Given the closeness of the OMV's evidenced by the submitted Financial Viability Assessment (FVA) and the Council's Planning Viability Advisor, taking account of the detailed information provided by the submitted FVA, the Council will accept the applicants OMV of £950,000. On this basis, using the Council's Tenancy Strategy rent per week as per the weekly rent levels from 2023/24 as the application was validated after 1st April 2024, and the OMV included within the submitted FVA, this results in an affordable housing contribution of £221,178 which is only marginally lower than the commuted sum estimated by the applicant of £229,630.

The applicant has provided a Financial Viability Appraisal as part of the submitted application which concludes the proposal is unable to support any affordable housing contribution. It is an explicit requirement of Policy LP36 that the developer underwrites the costs of a Council commissioned economic viability assessment, in order for this evidence to be tested.

However, the application stands to be refused for the reasons set out in this report. The council, as per common practice, therefore do not consider it expeditious to request that the applicant undertake council's external consultant's costs for a full financial appraisal at this stage given that the scheme is fundamentally unacceptable, and the findings would not alter the outcome of the application.

In the absence of the above, the lack of affordable housing contribution forms a reason for refusal as the proposal fails to address the recognised housing need. The applicant is advised to contact the Council to progress this review in the event of any appeal.

Consequently, the application fails to demonstrate that benefits can be secured in terms of affordable housing to support LP38.

Issue vi - Sustainability

Policy LP22 states "Developments will be required to achieve the highest standards of sustainable design and construction in order to mitigate against climate change." Developments of 1 dwelling unit or more will be required to comply with the Sustainable Construction Checklist SPD. New residences are also required to achieve the water consumption targets. Proposals for change of use which create a new residential unit are required to achieve BREEAM Domestic Refurbishment 'Excellent' and a 35% reduction in CO2 emissions over Building Regulations.

Paragraph 6.3.2 of policy LP22 of the Local Plan (2018) states "The Council's Sustainable Construction Checklist SPD will be applied to development which involves the creation of one or more residential units, and commercial or other developments of 100sqm or more (including extensions). Applicants are required to submit an Energy Statement to show how the requirements of the themes within the Checklist have been met within the proposed new development."

The completed sustainable construction checklist demonstrates a score of 47 - Rating C - Minimal effort to increase sustainability beyond general compliance.

The applicant has provided an 'Energy & Sustainability Statement' to show how energy/sustainability benefits are achieved through the scheme. This report concludes:

- The energy strategy has shown the cumulative CO2 savings on site are estimated at 86.79% over the existing building baseline assessment which has been modelled in line with Part L 2021.

- The Regulated CO2 emissions for the development have been reduced against an existing building baseline assessment which has been modelled in line with Part L 2021 through on-site measures alone by 13.21% (0.46 tonnes per annum).
- The BREEAM pre-assessment undertaken in support of the application indicates that a score of 71.66% can be obtained, corresponding to a rating of 'Excellent'.

Page 12 of the 'Energy & Sustainability Statement' notes that the new dwelling will comply with the maximum water consumption allowance of 110l per person per day (including an allowance of 5l or less per person per day for external water consumption). However, the submitted 'Water Efficiency Calculator for New Dwellings' indicates that the total consumption will be 117.71l per person per day, contrary to SPD. The scheme will be conditioned to ensure that the maximum water consumption will be 110l per person per day.

The energy report explains that this will be achieved through efficiency improvements, MVHR and ASHP. No external plant has been indicated on the submitted drawings although it is understood that the proposed model chosen does not rely on any outdoor unit.

In view of the above, the application is in line with the aims and objectives of policy LP22, as well as relevant SPD's.

Issue vii - Transport and Parking

Policy LP44 of the Local Plan states 'The Council will work to promote safe, sustainable and accessible transport solutions, which minimise the impacts of development including in relation to congestion, air pollution and carbon dioxide emissions, and maximise opportunities including for health benefits and providing access to services, facilities and employment.'

Policy LP45 of the Local Plan (2018) states that vehicle provision should be formed in accordance with the needs of the development including cycle parking and minimising car use. Car free developments are likely to be acceptable in areas with high public transport accessibility such as in an area with a PTAL score of 5 and 6 and where it will not contribute to on-street parking stress in the locality.'

Access

The applicant proposes to provide two pedestrian accesses to the development, one for each dwelling, one at the eastern side of Orleans Road (Unclassified Road) and another to the southern side of Chapel Road (Unclassified Road) to the entrance at the front of the building.

Vehicular Parking

The applicant has presented the proposed development as car free. The site has a PTAL of 3 and is in a controlled parking zone 'S/S1 - Orleans' Times: Monday to Sunday 10am to 4:30pm between 1 April and 31 October; Monday to Friday 10am to 4:30pm between 1 November and 31 March.

The applicant is expected to enter into a legal agreement with the council under S106 of the Town and Country Planning Act 1990 which will preclude occupants of the site from buying permits to park in any CPZ. This is to mitigate the potential impact of overspill parking from the development in accordance with Para. 110d of the NPPF. This will be secured by way of condition.

The applicant has presented a Transport Statement which contains trip generation data based on current use and a TRICS assessment based on forecast use. The development will reduce the average vehicular trips on a weekday. This is comparing the baseline TRICS analysis with the future TRICS analysis which is the most robust method.

Cycle Parking

The proposal creates a cycle store for two bikes, for each dwelling, to securely store their cycles inside the building in accordance with the London Plan (2021).

Full details of suitable cycle storage can be secured by way of condition.

Construction Management Plan

An outline 'Construction Management Plan' has been presented. However, a detailed Construction Management plan will be secured by way of pre-commencement planning condition.

The following link offers advice on the information council require:
https://www.richmond.gov.uk/media/22165/construction_management_plan_guidance_notes.pdf

Issue viii - Refuse and Recycling

The applicant proposes refuse storage for each dwelling internally. This must accommodate per dwelling; 240

refuse bin, 2x 55l boxes for mixed recycling and 1x23l container for food waste recycling, in accordance with the London Borough of Richmond's supplementary planning guidance. These bins can be serviced from Orleans Road and Chapel Road respectively. Full details of suitable refuse stores can be secured by way of condition.

Issue ix - Trees

Policy LP16 of the Local Plan states 'The Council will require the protection of existing trees and the provision of new trees, shrubs and other vegetation of landscape significance that complement existing, or create new, high quality green areas, which deliver amenity and biodiversity benefits.'

The location of this proposal is sited within the CA8 Twickenham Riverside, Conservation Area which affords trees both within and adjacent to the site of the proposal, statutory protection. However, there are no recorded Tree Preservation Orders (TPO) within or adjacent to the site of the proposal.

There are no nearby trees that will be affected by the proposal. As such, the proposed development would accord with Policy LP 16 of the Local Plan.

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

Issue x - Views and Vistas

Policy LP5 of the local plan states 'The council will protect the quality of the views, vistas, gaps and the skyline, all of which contribute significantly to the character, distinctiveness and quality of the local and wider area'

The height of the existing building will remain as existing. Thus, proposal will have a neutral impact on the 004 View from near Ham House to Orleans House & 005 View to Marble Hill House (north) protected views. Therefore, the scheme is compliant with the aims and objectives of LP5 of the Local Plan, 2018.

Issue xi - Archaeology

Policy LP7 states that "the Council will seek to protect, enhance and promote its archaeological heritage (both above and below ground), and will encourage its interpretation and presentation to the public." The application site is located within an archaeological priority area.

The proposal will not result in excavation works and therefore will not impact upon any archaeological remains. As such, no objection is raised to the proposal in this regard.

Issue xii - Flood Risk

Policy LP21 of the Local Plan states 'All developments should avoid or minimise, contributing to all sources of flooding, including fluvial, tidal, surface water, groundwater and flooding from sewers, taking account of climate change and without increasing flood risk elsewhere.'

Whilst the site is within flood zone 1, it does fall within a throughflow catchment area, and it is in an area of increased potential for elevated groundwater. However, no groundworks are proposed or impacts that would affect surface water runoff.

Issue xiii - Biodiversity

Biodiversity net gain became mandatory for minor developments on applications made from 2nd April 2024. This application is exempt from mandatory biodiversity net gain on the grounds that:

- The application was made before 2nd April 2024
- The development impacts habitat of an area below a 'de minimis' threshold of 25m² or 5m of linear habitat such as hedgerows, and does not impact an onsite priority habitat
- The development is for a small scale self-build or custom house building

The application was received by the council on 03.04.2024, however upon request for a BNG Statement the applicant submitted evidence that the application was made and paid for via the planning portal on 28.03.2024.

Issue xiv - Contamination

The building is said to have previously been in use as a garage and with its industrial background, may be subject to contamination. Had the application been otherwise acceptable, a safeguarding condition would have been applied to address this concern.

Other Matters**Fire Safety**

The applicant has submitted a 'Planning Fire Safety Statement' to address policy D12 of the London Plan (2021).

The applicant is advised that alterations to existing buildings should comply with the Building Regulations. This permission is NOT a consent under the Building Regulations for which a separate application should be made.

8. LOCAL FINANCE CONSIDERATIONS AND OTHER MATTERS

Section 70(2) of the Town and Country Planning Act 1990 (as amended) provides that a local planning authority must have regard to a local finance consideration as far as it is material. The weight to be attached to a local finance consideration remains a matter for the decision maker. The Mayor of London's CIL and Richmond CIL are therefore material considerations.

This is to notify you that had this development received planning consent it would be liable for a chargeable amount under the Community Infrastructure Levy Regulations 2010 (as amended by the Community Infrastructure Levy Regulations 2012).

9. RECOMMENDATION

This recommendation is made following careful consideration of all the issues raised through the application process. In making this recommendation consideration has been had to the statutory duties imposed by the Planning (Listed Buildings and Conservation Areas) Act 1990 and the requirements set out in Chapter 16 of the NPPF.

For the reasons set out above, it is considered that the adverse impacts of allowing this planning application would significantly outweigh the benefits, when assessed against the policies in NPPF and Development Plan, when taken as a whole.

Refuse planning permission for the following reasons

Refusal - Loss of industrial floorspace

The scheme, by reason of the loss of an existing B8 industrial unit and in the absence of robust and compelling evidence that clearly demonstrates that there is no longer a demand for an industrial based use in this location and that there is not likely to be in the foreseeable future, or a sequentially preferable employment generating or community use, would reduce employment opportunities within the locality contrary to the aims of the Council's employment policies. The proposal therefore fails to comply with Policy E2, E4, and E7 of the London Plan, Policies LP40 and LP42 of the Local Plan (2018) and policy 22 and 24 of the Publication Local Plan as supported by the Greater London Authority (GLA) Industrial Land Supply Study (2023), the Employment Land and Premises Needs Assessment (December 2021) and Employment Land and Premises Needs Assessment Update (April 2023).

Reason for Refusal - Design/Heritage

The combined extensions and alterations, by reason of their siting, scale and design, would result in significant alteration creating an unsympathetic and incongruous form of development that harms the character and proportions of the host building and fails to preserve or enhance the setting, character and appearance of the Twickenham Riverside conservation area and the special interest/significance of 14-15 Montpelier Row (Grade II*), as well as detracting from the setting of surrounding Buildings of Townscape Merit. This is contrary to policies, in particular, LP1, LP3 & LP4 of the Local Plan (2018), Publication Local Plan policies 28, 29 and 30, and the Supplementary Planning Document Buildings of Townscape Merit and Richmond & Twickenham Village Planning Guidance as supported by the Twickenham Riverside Conservation Area Statement and Appraisal. The proposals do not satisfy the statutory duty of Section 72 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and do not meet Policy HC1 or D3 of the London Plan (2021) or relevant paragraphs of the NPPF (2023).

Reason for Refusal - Affordable Housing

In the absence of a legal agreement to secure an appropriate contribution towards off-site affordable housing, or independent verification of evidence to demonstrate that a contribution is not viable, the scheme fails to address the recognised housing need and will be contrary to, in particular, to Local Plan Policy LP36, Publication Local Plan Policy 11, Supplementary Planning Document on Affordable Housing (2014) and the National Planning Policy Framework.

Reason for Refusal – Residential Amenity

The proposal by reason of its siting, depth and height, in the absence of adequate information on impact on light, would result in a dominant, overbearing and visually intrusive form of development, which would create an unacceptable sense of enclosure to the private amenity space of the adjacent neighbouring property at no. 1 Chapel Road and fails to demonstrate that there would not be a harmful loss of light, detrimental to the amenities of the occupants thereof. The development is thereby contrary to the aims and objectives of the NPPF [2023], Policy LP8 of the Local Plan [2018] and Policy 46 of the Publication Local Plan.

Recommendation:

The determination of this application falls within the scope of Officer delegated powers - YES / ~~NO~~

I therefore recommend the following:

- 1. REFUSAL
- 2. PERMISSION
- 3. FORWARD TO COMMITTEE

This application is CIL liable YES* NO
(*If yes, complete CIL tab in Uniform)

This application requires a Legal Agreement YES* NO
(*If yes, complete Development Condition Monitoring in Uniform)

This application has representations online (which are not on the file) YES NO

This application has representations on file YES NO

Case Officer (Initials): KM

Dated: 11.06.2024

I agree the recommendation:

This application has been subject to representations. The Head of Development Management / South Area Team Manager has considered those representations and concluded that the application can be determined without reference to the Planning Committee in conjunction with existing delegated authority.

South Area Team Manager:ND.....

Dated:12.06.2024.....