



PLANNING REPORT

Printed for officer by  
Jack Davies on 24 May 2024

**Application reference: 24/0534/LBC**  
**SOUTH RICHMOND WARD**

Date application received	Date made valid	Target report date	8 Week date
29.02.2024	08.03.2024	03.05.2024	03.05.2024 EOT agreed 12.06.2024

**Site:**

Richmond College, Queens Road, Richmond, TW10 6JW

**Proposal:**

Internal alterations including removal of internal walls to allow for the use of the building as a secondary school, with on-site boarding accommodation.

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

**APPLICANT NAME**

---  
c/o Savills  
33 Margaret Street  
London  
W1G 0JD

**AGENT NAME**

Mr Joseph Oakden  
33  
Margaret Street  
London  
W1G 0JD

**DC Site Notice:** printed on 09.03.2024 and posted on 15.03.2024 and due to expire on 05.04.2024

**Consultations:**

**Internal/External:**

**Consultee**  
21D Urban D  
English Heritage 1st Consultation  
14D Urban D

**Expiry Date**  
30.03.2024  
16.04.2024  
15.05.2024

**Neighbours:**

-

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

Development Management

Status: GTD  
Date:19/04/1977

Application:76/1153  
Alterations and conversion of existing garages within the existing building profile into residential accommodation for students to provide 5 bedrooms, kitchen, shower and W.C. facilities and erection of canopy to new entrance door.

Development Management

Status: GTD  
Date:19/04/1977

Application:76/1298  
Alterations to widen two vehicular accesses.

<u>Development Management</u> Status: GTD Date:19/04/1977	Application:77/0074 Demolition and making good of end of wall at two access points to Queens Road.
<u>Development Management</u> Status: REF Date:24/01/1979	Application:78/1156 Construction of hard surface playing area, erection of single storey changing room and 3.5 m high fence.
<u>Development Management</u> Status: GTD Date:04/12/1979	Application:79/0790 Construction of a hard tennis court and erection of a 3.6 m high chain link fencing.
<u>Development Management</u> Status: GTD Date:16/11/1982	Application:82/0541/DD01 Erection of two temporary buildings on existing car park area. (Details of colour). Condition No. (b) of planning permission 82/0541 dated 6.7.82.
<u>Development Management</u> Status: GTD Date:16/07/1982	Application:82/0541 Erection of two temporary buildings on existing car park area.
<u>Development Management</u> Status: GTD Date:05/07/1983	Application:83/0665 Erection of mezzanine floor in library with associated alterations.
<u>Development Management</u> Status: GTD Date:20/09/1983	Application:83/0839 Single storey extension at ground floor level to form new Common Room. (Plan OCL/8314/01 amended on 30th August, 1983).
<u>Development Management</u> Status: GTD Date:20/09/1983	Application:83/0840 Single storey extension at ground floor level to form new Common Room. (Plan No. OCL/8314/01 amended on 30/8/83).
<u>Development Management</u> Status: GTD Date:12/01/1984	Application:83/1380 Erection of a mezzanine floor in the existing dining hall with associated alterations.
<u>Development Management</u> Status: GTD Date:07/06/1985	Application:84/0485/DD02 Erection of a 5-storey rear extension. (Detailed drawings condition 4 - roof materials).
<u>Development Management</u> Status: GTD Date:25/01/1985	Application:84/0485/DD01 Erection of a five storey rear extension. (Detailed Drawings - Condition 4 - Materials-bricks).
<u>Development Management</u> Status: GTD Date:25/07/1984	Application:84/0485 Erection of a five storey rear extension.
<u>Development Management</u> Status: GTD Date:25/07/1984	Application:84/0486 Erection of a five storey rear extension.
<u>Development Management</u> Status: GTD Date:25/09/1984	Application:84/0903 Retention of two temporary buildings on car park area.
<u>Development Management</u> Status: REF Date:28/05/1986	Application:85/1546 Creation of car park for 40 cars with access from college grounds, on land formerly used as nursery garden.
<u>Development Management</u> Status: GTD	Application:85/1670

Date:28/05/1986	Demolition of two sections of brick wall enclosing existing nursery plot.
<u>Development Management</u> Status: GTD Date:28/07/1987	Application:86/1915 Renewal of permission to retain two temporary buildings on car park area.
<u>Development Management</u> Status: GTD Date:08/09/1987	Application:86/2002 Development of nursery garden plot to provide a new presidents residence and to extend the existing Langley House to form an additional classroom with three offices (Amended Plan No.(s) 642/02A, 03B, 08A, 10B and 11B received on 30th July 1987).
<u>Development Management</u> Status: GTD Date:08/09/1987	Application:87/0185/LB Demolition of part of existing garden wall to provide vehicular access to proposed new Presidents residence and construction of proposed new Longley House extension (Amended Plan No. 642/02A received on 30.7.87).
<u>Development Management</u> Status: GTD Date:01/05/1975	Application:74/1135 Installation of six external fire escapes and internal alterations.
<u>Development Management</u> Status: GTD Date:	Application:06/T0064/TCA T1 - Sycamore (Acer pseudoplatanus) - Fell. T2 - Sweet Chestnut (Castanea sativa) - Pollard to main trunk.
<u>Development Management</u> Status: PDE Date:	Application:07/T0818/TCA T1; Horse Chestnut - Fell T2; Horse Chestnut - Crown reduce by 30% T3; Lime - Crown reduce by 30% T4; Sycamore - Deadwood, remove damaged branches T5; Sycamore - Fell T6; Oak - Reduce overall size by 30% T7; Birch - Fell T8; Sycamore - Pollard T9; Poplar - Remove limb overhanging drive
<u>Development Management</u> Status: PDE Date:	Application:08/T0095/TCA T1; Cedar - Crown thin 10%
<u>Development Management</u> Status: RNO Date:10/03/2010	Application:10/T0076/TCA T1 - Acer Pseudoplatanus - Fell T2 - Lime - Fell T3 - Lime - Crown reduce by 30%
<u>Development Management</u> Status: WDN Date:18/05/2015	Application:15/1670/LBC Refurbish a bathroom to modern standards by forming two wet rooms in the location of the one WC.
<u>Development Management</u> Status: GTD Date:17/04/2024	Application:24/0471/PS192 Proposed use of the site as a school providing boarding accomodation (Use Class C2)
<u>Development Management</u> Status: PCO Date:	Application:24/0534/LBC Internal alterations including removal of a small number of internal walls to allow for the use of the building as a secondary school, with on-site boarding accommodation.

<b>Application Number</b>	<b>23/0534/LBC</b>
<b>Address</b>	<b>Richmond College Queens Road Richmond TW10 6JW</b>
<b>Proposal</b>	<b>Internal alterations including removal of internal walls to allow for the use of the building as a secondary school, with on-site boarding accommodation.</b>
<b>Contact Officer</b>	<b>Jack Davies</b>
<b>Legal Agreement</b>	<b>NO</b>

## 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 conducted a desktop review, 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 American International University, otherwise known as Richmond College is a grade II listed building situated within landscaped grounds along with a number of associated buildings, some of which are identified as Buildings of Townscape Merit. The building is also situated within the Richmond Hill Conservation Area although the north-eastern part of the site is situated within the St Matthias Conservation Area.

The building is of architectural interest, forming a fine example of a grand institutional building constructed in 1843 and forming is highly decorative neo-Gothic Tudor style to the main building and a more Tudor style to George House to the south. This long, four-storey ashlar building, set in extensive grounds with lawns and mature trees, is an impressive structure with seven bays on either side of central gate tower. There are projecting gable wings at either end. The mullioned windows have cusped heads. The gate tower has octagonal buttresses, ogee capped finials and a two-storey oriel over the entrance. The building is also of historic interest for illustrating a key phase in the development of Richmond Wesleyan Movement, of which the building was constructed for. It is also of historic interest for its association with architect Andrew Trimen, the building forming his first major commission. Trimen went on to become a prolific architect, specializing in ecclesiastical architecture.

The architectural interest of listed building is manifested in both the exterior and parts of the interior. The building retains a high proportion of original features and details which makes for a highly elaborate façade treatment which compliments its landscaped setting which pre-dates the building. The grandeur reflected the importance of the Wesleyan Movement and the purpose of the building for education. This elaboration and grandeur are also reflected in the interior, particularly the ground floor spaces although some have been altered to their detriment with additions such as mezzanine floors to the principal rooms. The main staircase is also altered greatly and lacks the elaboration of the original staircase as shown the accompanying heritage statement. The upper floors are simpler in appearance and form with small rooms leading from a central corridor, reflecting their use as dorm rooms. However, this plan form remains intact to the main wings and thus contributes to the significance of the building.

The rear extensions of the building and that of George House have a more varied degree of significance. The 1930s rear extension contributes significantly to the special interest of the listed building due to the level of surviving interior fabric and its association with Edward Maufe, highly notable architect. This part of the building has been adapted but the architectural treatment remains very much appreciable. Other later extensions and those which have been heavily altered are of lesser significance. The third floor extensions to the side wings are complimentary to the architecture of the building and integrate well externally but are of lesser significance

relative to earlier and original elements of the building.

George House has been heavily altered internally and externally but is believed to pre-date the original college. It forms an interesting juxtaposition to the heavily detailed Gothic facades but is clearly heavily adapted, particularly internally with little appreciation of historic plan form or features.

Within the grounds of the building are several buildings, most of which contribute to the setting of the listed building. Most important is the Edwardian house known as Red House which is in an Arts and Crafts style and forms a complimentary feature in the well treed landscape surroundings. The Library is a modern addition to the site, added in the 1990s and whilst formed a substantial addition to the site, its architectural composition is respective of the listed building, yet forming a successful modern interpretation. Internally however, there is nothing of significance and as the building was constructed after 1948, it would not be considered curtilage listed.

Whilst largely screened from public views within the Conservation Area, the buildings, particularly the listed building, makes a positive contribution to its character and appearance, forming part its rural leafy quality. It is noted however that the proposed works are sited principally to the interior and therefore will not affect the conservation area. The focus of the assessment for this listed building consent application will therefore be on the impact on the special interest of the listed building.

The site is subject to the following designations:

- Article 4 Direction Basements
- Building of Townscape Merit
- Conservation Area (CA30 St Matthias Richmond)
- Conservation Area (CA5 Richmond Hill)
- Critical Drainage Area
- Listed Building Grade: II Site: Richmond College Queens Road Richmond Surrey TW10 6JW
- Risk of Flooding from Surface Water 1 in 30 chance
- Risk of Flooding from Surface Water 1 in 100 chance
- Risk of Flooding from Surface Water 1 in 1000 chance
- Take Away Management Zone (Take Away Management Zone)
- Thames Policy Area (Thames Policy Area)
- Throughflow Catchment Area

The site is also within the wider setting of surrounding listed buildings to the east and south.

### 3. DESCRIPTION OF THE PROPOSAL AND ANY RELEVANT PLANNING HISTORY

The proposed scheme is for Internal alterations including removal of internal walls to allow for the use of the building as a secondary school, with on-site boarding accommodation.

There is an extensive planning history. This includes the following (with some more relevant conditions highlighted):

**76/1153** - Alterations and conversion of existing garages within the existing building profile into residential accommodation for students to provide 5 bedrooms, kitchen, shower and W.C. facilities and erection of canopy to new entrance door. **Granted 1977**

a) Subject to the following conditions:— (21), (60) attached hereto, and

(a) That no more than 6 persons shall be accommodated at the premises at any time.

CONDITION NO. 60.

No playing of musical instruments, singing or other activities likely to create undue noise shall take place after 12 midnight unless the consent in writing of the Local Planning Authority has first been obtained.

**86/2002** - Development of nursery garden plot to provide a new presidents residence and to extend the existing Langley House to form an additional classroom with three offices. **Granted 8.09.87**

(b) The Presidents House hereby approved shall at no time be used as Students accommodation or for any purpose other than as a single family dwelling house.

(c) The new classroom block hereby approved shall not be used for teaching or other student activities on any Sunday or Bank holiday nor before 8am or after 7pm on Monday - Friday nor before 8am or after 1pm on Saturdays.

**89/2049/FUL & 89/2085/LBC** - Erection of a four storey building to provide a new library complex on ground and first floors and additional classrooms and seminar rooms on 2nd & 3rd floors. **Granted 13th December 1990**

**90/1480/FUL** - Amendment to condition (h) of planning permission 89/2049 to allow for number of students on college premises to be a maximum of 590. **Granted 10th December 1990**

**94/2189/FUL** - Erection of a four storey building to provide a new library on ground and first floors and additional classrooms and seminar rooms on 2nd and 3rd floors, formation of parking areas. **Granted 13th April 1995**

**97/2740** - Erection of a five storey building (including basement) to provide a new library on ground and first floors, additional classrooms seminar rooms and faculty offices on the second and third floors and seminar area and plant in the basement. **Granted 29th June 1998**

**05/3599/FUL & 05/3600/LBC** Formation of a new mansard roof to George House to provide 8 additional bedrooms as ancillary accommodation, and provision of cycle storage. **Granted 24th July 2006**

**24/0471/PS192** - Proposed use of the site as a school providing boarding accommodation (Use Class C2). **Granted**

#### **4. CONSULTATIONS CARRIED OUT**

A site notice was erected and no representations were received.

Revised drawings were received which removed elements which would also require planning permission. Further information was also provided in regards to structure. It was not necessary to report the site notice.

#### **5. MAIN POLICIES RELEVANT TO THE DECISION**

##### **NPPF (2023)**

The key chapters applying to the site are:

Section 4: Decision-making

Section 12: Achieving well-designed places

Section 15: Conserving and enhancing the natural environment

Section 16: Conserving and enhancing the historic environment

These policies can be found at:

[https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF\\_December\\_2023.pdf](https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf)

##### **London Plan (2021)**

The main policies applying to the site are:

HC1 Heritage conservation and growth

D4 Delivering good design

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

**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
Impact on Heritage Assets	LP3, LP4	Yes	No

These policies can be found at [https://www.richmond.gov.uk/media/15935/adopted\\_local\\_plan\\_interim.pdf](https://www.richmond.gov.uk/media/15935/adopted_local_plan_interim.pdf)

**Supplementary Planning Documents**

Listed Buildings  
Conservation Areas

These policies can be found at: [https://www.richmond.gov.uk/services/planning/planning\\_policy/local\\_plan/supplementary\\_planning\\_documents\\_and\\_guidance](https://www.richmond.gov.uk/services/planning/planning_policy/local_plan/supplementary_planning_documents_and_guidance)

**Richmond Publication Local Plan (Regulation 19 version)**

The Richmond Publication Version Local Plan (Regulation 19 version) was published on 9 June 2023 for public consultation which ended on 24 July 2023.

The Publication Version Local Plan, together with all the representations received during the representation period, the plan and its supporting documents were submitted to the Secretary of State for examination on 19 January 2024. The submission documents do not form part of the statutory development plan for the Borough, however, by publishing and submitting the Borough Local Plan for independent examination the Council has formally confirmed its intention to adopt the Publication Plan.

The Publication Version Local Plan, including its evidence base, are material considerations for decision-making. 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 Borough Local Plan to be sound and legally compliant, officers and Councillors should accord relevant policies and allocations significant weight in the determination of applications taking account of the extent to which there are unresolved objections to relevant policies. Therefore, the weight afforded to each policy at this stage will differ depending on the level and type of representation to that policy. This is addressed in more detail in the assessment below where it is relevant to the application.

Note that it was agreed by Full Council on 27 April, when the Publication Plan was approved, 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.

Issue	Publication Local Plan Policy	Compliance	
Local character and design quality	28	Yes	No
Designated heritage assets	29	Yes	No

**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.

### **Determining applications affecting a Listed Building**

Sections 16(1) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 require that, when considering whether to grant listed building consent for any works, or whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting, or any features of special architectural or historic interest which it possesses. In this context, "preserving", means doing no harm.

To give effect to this duty decisions of the court have confirmed that a decision-maker should accord "considerable importance and weight" to the desirability of preserving the listed building or its setting when weighing this factor in the balance with other material considerations which have not been given this special statutory status. However, this does not mean that the weight that the decision-maker must give to the desirability of preserving the building or its setting is uniform. It will depend on, among other things, the extent of the assessed harm and the heritage value of the asset in question. This creates a strong presumption against granting planning permission where harm to a listed building or its setting is identified. The presumption can be rebutted by material considerations powerful enough to do so.

## **6. EXPLANATION OF OFFICER RECOMMENDATION**

The key issues for consideration are:

- i Design
- ii Fire Safety

### **Issue i – Design/Heritage**

*The NPPF (National Planning Policy Framework) advises good design is a key aspect of sustainable development and is indivisible from good planning and should contribute positively to making places better for people. Local Plan Policy LP1 states 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.*

*The NPPF states that there should be a presumption in favour of the conservation of designated heritage assets and the more significant the designated heritage asset the greater the presumption in favour of its conservation should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting.*

Local Plan Policy LP1 requires: *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.*

Local Plan Policy LP3 states that *The Council will require development to conserve and, where possible, take opportunities to make a positive contribution to, the historic environment of the borough. Development proposals likely to adversely affect the significance of heritage assets will be assessed against the requirement to seek to avoid harm and the justification for the proposal.*

The proposals follow on from two pre-application submissions and comprise internal works to the building to facilitate its retention as an educational facility but with greater classrooms but fewer dorm rooms. Works include the removal of a large number of walls, including structural walls, to facilitate the opening up of rooms, namely in the north and south wings, George House and at second floor level in the main listed building.

For completeness, an assessment of which buildings are considered curtilage listed are included below:

- George House (by virtue of attachment)
- The Red House
- Upper Cottage and Lower Cottage
- Oak Tree Cottage

It is important to note however that no works are proposed to Upper, Lower and Oak Tree cottages and therefore this will not form a concern. For clarity, the Library, Longley House and Orchard House are not considered curtilage listed as these appear to have been constructed after 1st July 1948. We would however consider that the exterior of the Library to hold some architectural interest for it to be considered a non-designated heritage asset.

#### Impact Assessment

##### *Library*

There are no objections to the works to the Library in terms of opening up of the interior spaces, as this would not impact on significance. There are no external works so the interest of the building as a positive feature of the setting of the listed building and the conservation area will be maintained.

##### *The Red House*

The removal of some walls in the Red House will affect the plan form however the retention of nibs and down stands will greatly assist in reducing the impact and allow the plan form to remain legible.

##### *George House*

No objections to the principle of the interior works to George House as this part of the listed complex is heavily altered and nothing remains of significance.

It is noted that structural intervention is proposed. Structural drawings and a report accompany this application and this has been independently reviewed, noting that the design is well considered. A condition will be attached to a successful application which secures compliance with these documents.

##### *Main Listed Building*

The main element of change to the interior of the listed building which will have a significant impact is at second floor level and at all levels in the north and south wings. The main premise of the works is the removal of many walls to allow for larger rooms for use as classrooms. These walls include chimney stacks and fireplaces. At second floor level, the whole plan form will be changed with the central corridor removed and moved to the back of the building and new classrooms formed with the removal of large amount of walls. This will clearly have a significant impact on the listed building both in terms of structural interventions and total loss of plan form. It is noted that the historic plan form to the third floor will be maintained but nonetheless, it is considered that the loss of the original floor plan and layout would result in less than substantial harm to the significance of the building.

A detailed justification and assessment of need has been provided with this application. It is noted

from this document that there are clear challenges in offering other less harmful solutions in terms of the second floor plan form. The retention of the central corridor and amalgamation of some of the dorm rooms would not provide sufficient teaching space needed. Furthermore, many heritage benefits would not be achievable. This includes the removal of the mezzanines to the two principal spaces at ground floor level, better revealing their significance. It is considered that robust justification has been provided for the harm resulting from the proposals to open up many of the spaces to allow for larger classrooms.

However, in addition to the loss of plan form, the building will need to undergo significant structural interventions to achieve the new layouts proposed which will have the potential to cause less than substantial harm to the structural integrity of the listed building. Within the north and south wings, the whole floor structure is proposed to be removed, new foundations introduced, and a new steel moment frame. The supporting structural information also seeks to introduce two steel moment frames in the second-floor level to support two chimney stacks above. It is noted however, that the plans show that these are the only two structural elements at this level that need to be removed and most of the other walls to be removed are non-structural. This in turn, does reduce the potential extent of harm on the structural integrity of the listed building.

How these structural moment frames are inserted is subject to two options in the structural impact assessment and it is important to note that the extent of potential harm to the listed building differs with these two options. One retains the roof and chimney stacks above for both the wings and the second floor and introduces needle props at high level to support the roof structure while the floors below are removed and the moment frame inserted. Option 2, however removed the roof structure and chimney stacks, leaving only the external walls, and inserts the moment frame via a crane from above and down through the building. Clearly, option 2 will have a much greater level of impact as the whole roof structure will need to be removed and then reinstated. The roof structure for the wings is later as the top floor was a later addition but this is not the case for the main listed building.

Following the Council's independent review of the structural submission, it is understood that both options are structurally feasible, with the engineer agreeing that Option 1 would result in much less intervention to the Listed Building. Option 2 therefore has more potential to result in further harm to the Listed Building which would be weighted against the scheme.

In terms of benefits, there are many, all of which the Council agree are beneficial and would support. These are:

- The removal of the mezzanine floor and stairs at ground floor level to the left of the main entrance, reinstating the original proportions of the room.
- Removal of boxed in chimney breasts revealing either existing fireplaces or reinstating fire surrounds where lost (to be conditioned in terms of detailed drawings of new fireplaces);
- Removal of glazed partition to ground floor room to reinstate the proportions of the room;
- Removal of the security office in the main entrance hall;
- Removal of the partitions around the main entrance although it is noted that this holds very limited heritage benefit;
- Reinstatement of the original plan form in the 1930s Edward Maufe extension.

All these benefits are acknowledged and it is considered that these could outweigh the harm to the listed building in terms of the second floor works and that to the north and south wings, if the construction sequence option 1 is pursued as it maintained the roof and chimneys. As such, a condition would be attached which restricts the permission to Option 1 only, thereby minimising the harm, making the proposals acceptable on balance. Further details of a structural method statement can be secured by condition.

Overall, it is considered that the proposals will conserve the special interest of the listed building and therefore accords with the statutory duty of the 1990 Act, paras 205 and 206 of the NPPF and local policy LP3.

Officers note that Historic England were consulted on this application, however chose not to comment.

## **Issue ii – Fire Safety**

The applicant has submitted a Fire Safety Strategy in line with the requirements set out under Policy D12 of the London Plan. The Strategy suitably demonstrates compliance with this policy, though it is noted that this does not void the requirements for fire safety delivered under the Building Regulations

**7. 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.

On initial assessment this development is not considered liable for the Mayoral and Richmond CIL however this is subject to confirmation by the CIL Administration Team.

**8. RECOMMENDATION**

This recommendation is made following careful consideration of all the issues raised through the application process.

Paragraph 11 of the Framework explains how the presumption in favour of sustainable development applies. For the reasons set out above, this application falls to be determined in accordance with the test under section 38(6) of the 2004 Act, the proposal is in general conformity with the Development Plan overall and there are no material considerations of sufficient weight to justify refusal.

**Grant Listed Building Consent**

**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 on file  YES  NO

Case Officer (Initials): DAV Dated: 24.05.2024

**I agree the recommendation:**

South Area Team Manager: .....ND.....

Dated: .....12.06.2024.....