



# Planning Statement

21 Park Lane Richmond, London, TW9 2RA

Prior Approval for a change of use from offices (Class E) to residential use  
(Class C3)

Report prepared by Ben Kelly MRTPI

For and on behalf of Richa Singh

June 2024



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## 1.0 Introduction and Summary

- 1.1 This statement has been prepared in support of an application for Prior Approval for a change of use of part of The Old Schoolhouse at 21 Park Lane in Richmond, from offices (Class E) to residential (Class C3).
- 1.2 The change of use is sought under Class MA of the Town and Country Planning (General Permitted Development etc.) (England) (Amendment) Order 2021. The building is well arranged for residential use, with windows to all of the main rooms. No external changes are required and the architectural features of the building already read as a residential use.
- 1.3 Following the closure of the school the premises was in use for storage in connection with the business of equipment hire to the broadcasting and film industry. In 2015 the main schoolhouse was refurbished and converted to mixed residential and commercial use, with office space retained at 21 Park Lane (Use Class E(1)). At the same time, three new townhouses were built to the rear, arranged around an area of car parking and landscaping. The proposal site refers to the office space only, along with an associated parking space and access to common areas including bin and bike store.
- 1.4 The application is described as follows:
- “Change of use from offices (Class E) to a four bedroom dwelling (Class C3)”*
- 1.5 The Amendment to Schedule 2 Part 3 of the General Permitted Development Order (GPDO) permits a change of use of any building or land within its curtilage from a use falling within Class E (commercial, business and service) to a use falling within Class C3 (dwelling houses) subject to a number of conditions.
- 1.6 This Planning Statement sets out the legislation against which this application is submitted and assesses the proposal against the requirements of the legislation, in order to demonstrate that the proposed change is permitted development and no Prior Approval is required.
- 1.7 The statement is organised as follows:



- Application Site and Surroundings;
- Proposal;
- Qualifying Development;
- Planning Assessment; and
- Summary and Conclusion

1.8 In accordance with the provisions of Paragraph W (Prior Approval) the submission includes plans showing the proposed development, a floor plan indicating the dimensions and proposed use of each room, the position and dimensions of windows, doors and walls and the elevations of the dwelling house.

1.9 The following information supplements this application:

- Planning Drawings prepared by GoPlans, including:
  - Location Plan and Site Plan – E00(1)
  - Existing Plans, Elevations and Sections – Drawing A001-2D
  - Proposed Plans and Elevations – Drawing PL01-21PA-A-8
- Planning Statement prepared by West Green Planning Ltd (this document)

## 2.0 The Site and Surroundings

- 2.1 The application site is located on at 21 Park Lane in Richmond (Figure 1). It forms part of an old Schoolhouse, which was converted to commercial use in the 1980's and to a mixed commercial and residential use in 2015. We understand the space has been vacant for most of the period since the conversion.
- 2.2 The building is not listed but is located within the central Richmond Conservation Area and is considered to be of Townscape Merit.

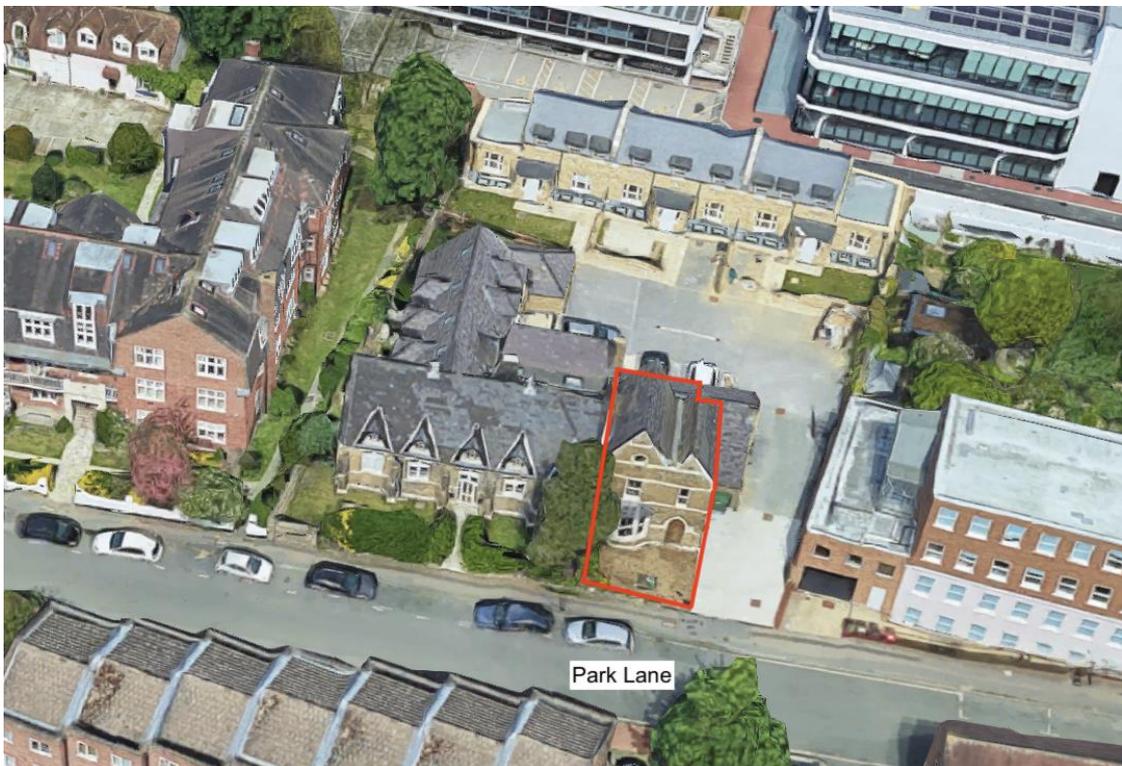


Figure 1 – Site Location in context (Aerial view)

- 2.3 The schoolhouse building is at the front of the site adjacent to the vehicular access. An area of car parking is to the rear which includes one space allocated to the office unit. The existing bin store for the office is to the side of the building and shared with the other residential units on the site.
- 2.4 The site is at the edge of Richmond Town Centre where the predominant character turns from commercial to residential. The buildings to the north, south and west are

all residential, whilst the building immediately to the right (east) is an office development and forms part of the key office area (Figure 2). Parts of this area are protected under an article 4 Direction preventing the operation of Class MA of the GPDO.

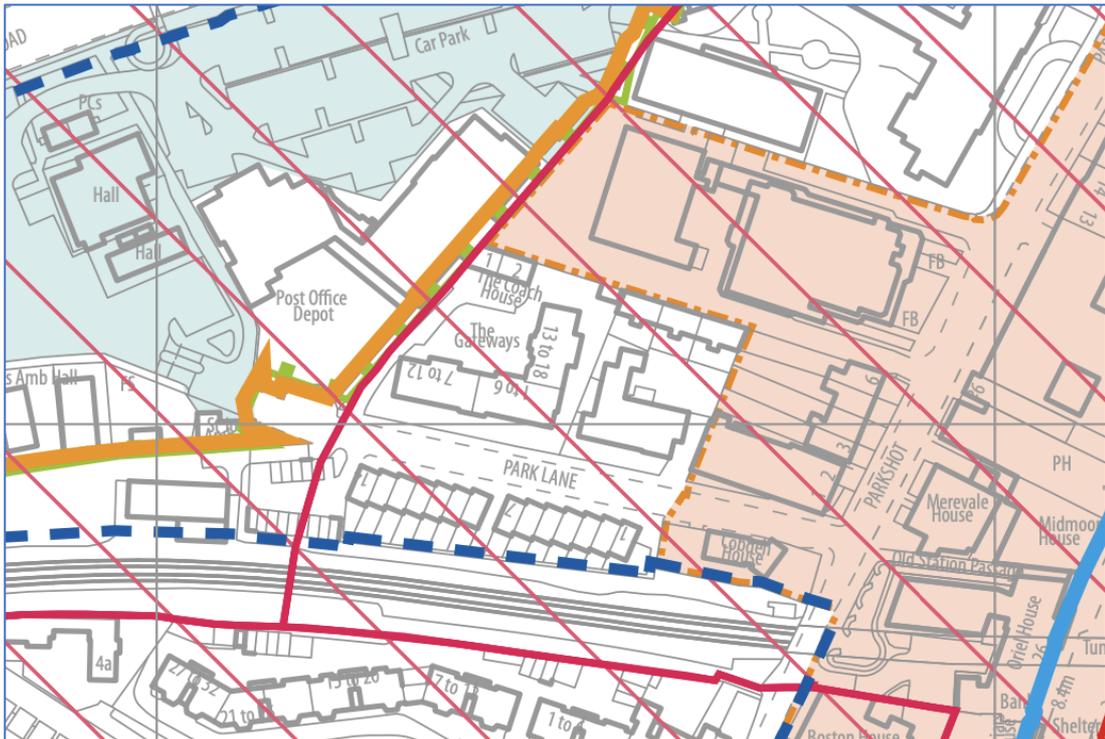


Figure 2 – Extract from Local Plan Proposal Map illustrating key office area in orange (also Article 4 area)

2.5 The site is centrally located with good access to local facilities and areas of open space, including Old Deer Park. It is approximately 130m from the primary shopping area and Richmond Rail Station.

2.6 The site is not under any other site allocation and is located outside of the Flood Zone (Flood Zone 1).

Site History

2.7 The building was originally part of a school, with records indicating this use ended in the early 1980s. The most recent planning history relates to the proposal to convert



the buildings to a residential use, retaining just one small element of office use within the schoolhouse building. The full available planning history is listed below:

- **14/3780/FUL** – The conversion and restoration of the Old School building to form 5 no.residential apartments, and 90 square metres of B1a Office space, and the erection of 3no. terraced townhouses with basement accommodation at the rear, with car parking, landscaping, and use of the existing vehicular access. – Granted 30th April 2015.

NB: Non-Material amendments have been made to the above application under references 14/3780/NMA; 14/3780/NMA1 and 14/3780/NMA2. All necessary conditions were discharged and the scheme appears to have been lawfully implemented.

- **12/2968/FUL** - Conversion (through dismantling and reconstruction of building) and extension to main 'School' building to form 5 no. 2 bedroom units and 1 no. 3 bedroom house; the demolition and removal of existing single storey extensions to main 'School' building and the erection of a terrace of 3 no. 3 and 4 bedroom townhouses. Associated landscaping works and car parking provision for 9 no. vehicles - Refused – Due to loss of employment floorspace as well accommodation, impact on neighbours & parking.
- **85/1772** - Change of use to storage together with ancillary offices, workshop and showroom in connection with the business of equipment hire to the broadcasting and film industry - Granted March 1986 and implemented.



### 3.0 Proposal

- 3.1 The proposal seeks to convert vacant commercial space to a residential use. The total floorspace involved in the conversion is 118sqm, which includes the storage space at the loft level.
- 3.2 The proposal seeks to reconfigure the internal layout to provide a 4 bedroom 6 person unit. The dwelling will meet minimum requirements of the Nationally described space standard of 112sqm for a 4b6p unit over three stories. The floor to ceiling heights all exceed 2.3m and the bedrooms all meet the necessary minimum requirements.
- 3.3 The property has been made available for purchase with vacant possession. In 2015 planning permission was granted to convert the rest of the Schoolhouse to residential use, leaving the entrance building as commercial. The unit has been vacant since at least 2021 and we have found no evidence of any occupancy since it was converted in 2015. The proposed residential use is appropriate for the site and the immediate surroundings.
- 3.4 No amendments to the facades are necessary and all habitable rooms benefit from adequate natural daylight, which is a requirement for the permitted change of use.
- 3.5 The site is centrally located within short walking distance from local facilities and local amenities. An off-street parking spaces will be retained to the rear and will continue to serve the unit.
- 3.6 In summary, the proposal will provide high quality living space that is compliant with national standards and the conditions placed on Class MA conversions. It will also provide a significant benefit to the local area by bringing a building of merit back into active use.



## 4.0 Qualifying Development

4.1 The relevant legislation against which this application is submitted is the Town and Country Planning (General Permitted Development etc.) (England) (Amendment Order 2021

4.2 This order introduces the following Change of Use as Permitted Development:

**MA. Development consisting of a change of use of a building and any land within its curtilage from a use falling within Class E (commercial, business and service) of Schedule 2 to the Use Classes Order to a use falling within Class C3 (dwelling houses) of Schedule 1 to that Order.**

4.3 Under the provisions of the Order, development is not permitted by Class MA;

~~a) unless the building has been vacant for a continuous period of at least 3 months immediately prior to the date of the application for prior approval;~~

*Since 5<sup>th</sup> March 2024 this is no longer a consideration*

b) unless the use of the building fell within one or more of the classes specified in subparagraph (2) for a continuous period of at least 2 years prior to the date of the application for prior approval;

*Complies – the lawful use of the unit is offices within Class E*

~~c) if the cumulative floor space of the existing building changing use under Class MA exceeds 1,500 square metres;~~

*Since 5<sup>th</sup> March 2024 this is no longer a consideration*

d) if land covered by, or within the curtilage of, the building—

- i. is or forms part of a site of special scientific interest;
- ii. is or forms part of a listed building or land within its curtilage;
- iii. is or forms part of a scheduled monument or land within its curtilage;
- iv. is or forms part of a safety hazard area; or



v. is or forms part of a military explosives storage area;

*Complies – the land does not fall within any of these categories.*

e) if the building is within—

- i. an area of outstanding natural beauty;
- ii. an area specified by the Secretary of State for the purposes of section 41(3) of the Wildlife and Countryside Act 1981(3);
- iii. the Broads;
- iv. a National Park; or
- v. a World Heritage Site;

*Complies – the building is not under any of these designations*

f) if the site is occupied under an agricultural tenancy, unless the express consent of both the landlord and the tenant has been obtained; or

*Complies – the site is not occupied under an agricultural tenancy*

g) before 1 August 2022, if—

- ~~i. the proposed development is of a description falling within Class O of this Part as that Class had effect immediately before 1st August 2021; and~~
- ~~ii. the development would not have been permitted under Class O immediately before 1st August 2021 by virtue of the operation of a direction under article 4(1) of this Order which has not since been cancelled in accordance with the provisions of Schedule 3.~~

*Since August 2022 this is no longer relevant*

4.4 Subject to the proposal site qualifying, Class MA is subject to a number of conditions and the developer must apply to the local planning authority for a determination as to whether the prior approval of the authority will be required. The proposal is considered against these conditions in the next section.



## 5.0 Planning Assessment

5.1 As described in the previous section, the proposal site qualifies as benefitting from permitted development under Class MA subject to a number of conditions. These conditions are considered below.

### Transport Impacts

5.2 Condition (a) requires consideration of the transport impacts of development and particularly to safe site access.

5.3 The site is sustainably located close the centre of Richmond and just 130m walk from the railway station. It's PTAL rating is 6a indicating excellent public transport accessibility. The unit already benefits from one off street parking space which will be retained. This is an appropriate level of parking for a dwelling of this size in this location and falls within the London Plan maximum standard. There is a CPZ in operation along Park Lane which will ensure no increase in on-street parking pressure. It is not considered necessary to further limit access to parking permits. Overall, transport impacts will be minimal and arguably reduced from the existing commercial use. The occupant of the unit will also benefit from access to the cycle parking for the whole development approved under the original permission.

### Contamination

5.4 Condition (b) requires consideration of contamination risks at the site.

The planning history for the site would not indicate the presence of contamination. The existing use is offices and the previous uses as a school and as internal storage for the film industry would not indicate any contamination. This was also not raised as a concern in the 2014 application.

### Flood Risks

5.5 Condition (c) requires consideration of flood risk in relation to the building. The site is



within Flood Zone 1 (Low Risk) and is less than a hectare and as such a Flood Risk Assessment is not required. There would be no increase in impermeable area and therefore no risk of increasing flood risk elsewhere.

#### Noise

- 5.6 Condition (d) requires consideration of the impact of noise from commercial premises on the intended occupiers of the development. The proposal forms part of an existing residential development and as such would be complimentary to the existing uses. The nearest commercial use is the office block to the east, which is separated by an access and is not a noisy use. Although the location is close to the town centre it is set back from the main shopping street on a relatively quiet road where there are other residential uses. The Central Richmond Conservation Area Appraisal describes the area as *“somewhat separate and quieter than the town centre”*.

#### Conservation Area

- 5.7 In accordance with Condition (e) there are additional considerations where a site is within a Conservation Area and involves the change of use of all or part of the ground floor. In this instance the site forms part of the Central Richmond Conservation Area and the proposal includes a change of use of the whole of the building including the ground floor. However, the architectural features of the building are domestic and its use as a residential dwelling would be complimentary to the rest of the old Schoolhouse building which was converted in 2015. There would be no changes to the frontage and there is no reason to consider that the proposal could negatively impact on the Conservation Area. The Central Richmond Conservation Area Appraisal notes that Park Lane is more residential in character and does not give any special attention to the application property.

#### Natural Light

- 5.8 Condition (f) requires all units to provide adequate natural light to all habitable rooms. The building was originally designed as a residential property and benefits from having



well placed existing windows serving all rooms. As such internal daylight levels are expected to be good. The layouts provided demonstrate that all habitable rooms will benefit from adequate natural daylight.

#### Impact from industry

- 5.9 Condition (g) requires assessment of the impact on intended occupiers where the use is in an area that is important for general or heavy industry, waste management, storage and distribution, or a mix of such uses. The proposal site is not within such an area and as such this is not a relevant consideration. The nearest use of this type is the Royal Mail Delivery Office, which is some 75m to the west with a substantial amount of residential development in between.

#### Loss of services

- 5.10 Condition (h) requires assessment where there may be a loss of services provided by a registered nursery or a health centre. Again, this is not a relevant consideration for this proposal as the previous use was B1 (now Class E) and the unit is vacant.

#### Space Standards

- 5.11 Schedule 1 part 3 paragraph 9A of the GDPO States that all new dwellings must comply with the nationally described space standards. The proposed dwellings have all been designed to meet or exceed the minimum space standards set out in the Technical Housing Standards: Nationally Described Space Standard.

#### Fire safety

- 5.12 The property is not over 18m or 6 storeys in height and therefore there would not be a requirement for a Fire Statement at planning stage. The layouts have taken due consideration of the regulatory requirements and the fire strategy will be considered at building control stage. As there is front and rear access onto an adopted highway there would be easy access for a fire appliance and multiple options for a suitable evacuation point.



### Planning Obligations

- 5.13 The National Planning Policy Guidance states *"By its nature permitted development should already be generally acceptable in planning terms and therefore planning obligations would ordinarily not be necessary. Any planning obligations entered into should be limited only to matters requiring prior approval and should not, for instance, seek contributions for affordable housing."* No obligations have been identified that would be necessary for this particular application.



## 6.0 Conclusion

- 6.1 In accordance with the assessment contained within this document, the proposal site can be considered as eligible for Class MA permitted development and compliant with the relevant conditions. As such the change of use can take place without the need for further assessment.