

Application reference: 22/3577/FUL SOUTH TWICKENHAM WARD

Date application received	Date made valid	Target report date	8 Week date
30.11.2022	24.05.2023	19.07.2023	19.07.2023

Site:

Units 3 And 15 Cross Deep Court, Heath Road, Twickenham, TW1 1AG

Proposal:

Change of use of part ground floor and part first floor to form six apartments at Cross Deep Court (Units 3 and 15), Heath Road, Twickenham, TW1 4AG.

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

APPLICANT NAME

C/O Agent James Lloyd
Create Planning
Wigglesworth House
69 Southwark Bridge Road
London
SE1 9HH
United Kingdom

AGENT NAME

Mr. James Lloyd
Wigglesworth House
69 Southwark Bridge Road
London
SE1 9HH

DC Site Notice: printed on and posted on and due to expire on

Consultations:

Internal/External:

Consultee

14D POL
LBRUT Transport
14D POL
LBRUT Transport

Expiry Date

14.06.2023
14.06.2023
08.06.2023
08.06.2023

Neighbours:

Suite 5 At 2nd Floor,30 Heath Road,Twickenham,TW1 4BZ, - 31.05.2023
Flat 8,Holly House,36 - 40 Heath Road,Twickenham,TW1 4BZ, - 31.05.2023
Flat 7,Holly House,36 - 40 Heath Road,Twickenham,TW1 4BZ, - 31.05.2023
Flat 6,Holly House,36 - 40 Heath Road,Twickenham,TW1 4BZ, - 31.05.2023
Flat 5,Holly House,36 - 40 Heath Road,Twickenham,TW1 4BZ, - 31.05.2023
Flat 4,Holly House,36 - 40 Heath Road,Twickenham,TW1 4BZ, - 31.05.2023
Flat 3,Holly House,36 - 40 Heath Road,Twickenham,TW1 4BZ, - 31.05.2023
Flat 2,Holly House,36 - 40 Heath Road,Twickenham,TW1 4BZ, - 31.05.2023
Flat 1,Holly House,36 - 40 Heath Road,Twickenham,TW1 4BZ, - 31.05.2023
Suite 11,Second Floor,30 Heath Road,Twickenham,TW1 4BZ, - 31.05.2023
First Floor,30 Heath Road,Twickenham,TW1 4BZ, - 31.05.2023
Holly House,36 - 40 Heath Road,Twickenham,TW1 4BZ, - 31.05.2023
Suite 6,30 Heath Road,Twickenham,TW1 4BZ, - 31.05.2023
Suite 10,30 Heath Road,Twickenham,TW1 4BZ, - 31.05.2023
Suite 8 And 9,30 Heath Road,Twickenham,TW1 4BZ, - 31.05.2023
Suite 7,30 Heath Road,Twickenham,TW1 4BZ, - 31.05.2023
Suite 12,30 Heath Road,Twickenham,TW1 4BZ, - 31.05.2023

Suite 4 At Second Floor,30 Heath Road,Twickenham,TW1 4BZ, - 31.05.2023
Suite 1 To 3,30 Heath Road,Twickenham,TW1 4BZ, - 31.05.2023
34 Heath Road,Twickenham,TW1 4BZ, - 31.05.2023
36-40 Heath Road,Twickenham,TW1 4BZ, - 31.05.2023
32 Heath Road,Twickenham,TW1 4BZ, - 31.05.2023
12 Heath Road,Twickenham,TW1 4BZ, - 31.05.2023
65 Holly Road,Twickenham,TW1 4HF, - 31.05.2023
Flat 4,61 Holly Road,Twickenham,TW1 4HF, - 31.05.2023
Flat 1,61 Holly Road,Twickenham,TW1 4HF, - 31.05.2023
Flat 2,61 Holly Road,Twickenham,TW1 4HF, - 31.05.2023
63 Holly Road,Twickenham,TW1 4HF, - 31.05.2023
Flat 3,61 Holly Road,Twickenham,TW1 4HF, - 31.05.2023
46 King Street,Twickenham,TW1 3SH, - 31.05.2023
Flat 2,46A King Street,Twickenham,TW1 3SH, - 31.05.2023
Flat 1,46A King Street,Twickenham,TW1 3SH, - 31.05.2023
67 Holly Road,Twickenham,TW1 4HF, - 31.05.2023
57A Holly Road,Twickenham,TW1 4HW, - 31.05.2023
57C Holly Road,Twickenham,TW1 4HW, - 31.05.2023
57B Holly Road,Twickenham,TW1 4HW, - 31.05.2023
Flat 4,2A Heath Road,Twickenham,TW1 4BZ, - 31.05.2023
Flat 3 At,2A Heath Road,Twickenham,TW1 4BZ, - 31.05.2023
Flat 2,2A Heath Road,Twickenham,TW1 4BZ, - 31.05.2023
Flat 1,2A Heath Road,Twickenham,TW1 4BZ, - 31.05.2023
62 King Street,Twickenham,TW1 3SH, - 31.05.2023
Ground Floor,67A Holly Road,Twickenham,TW1 4HF, - 31.05.2023
Ground And First Floors,56 - 58 King Street,Twickenham,TW1 3SH, - 31.05.2023
54A King Street,Twickenham,TW1 3SH, - 31.05.2023
First Floor,67A Holly Road,Twickenham,TW1 4HF, - 31.05.2023
Second Floor,2 - 4 Heath Road,Twickenham,TW1 4BZ, - 31.05.2023
Second Floor,60 King Street,Twickenham,TW1 3SH, - 31.05.2023
First Floor,60 King Street,Twickenham,TW1 3SH, - 31.05.2023
48C King Street,Twickenham,TW1 3SH - 31.05.2023
48B King Street,Twickenham,TW1 3SH - 31.05.2023
48A King Street,Twickenham,TW1 3SH, - 31.05.2023
Flat 3,52 King Street,Twickenham,TW1 3SH, - 31.05.2023
Flat 2,52 King Street,Twickenham,TW1 3SH, - 31.05.2023
Flat 1,52 King Street,Twickenham,TW1 3SH, - 31.05.2023
2-4 Heath Road,Twickenham,TW1 4BZ, - 31.05.2023
50 King Street,Twickenham,TW1 3SH, - 31.05.2023
60 King Street,Twickenham,TW1 3SH, - 31.05.2023
48 King Street,Twickenham,TW1 3SH, - 31.05.2023
52 King Street,Twickenham,TW1 3SH, - 31.05.2023
54 King Street,Twickenham,TW1 3SH, - 31.05.2023
6A Heath Road,Twickenham,TW1 4HG - 31.05.2023
6B Heath Road,Twickenham,TW1 4HG - 31.05.2023
14 Heath Road,Twickenham,TW1 4BZ, - 31.05.2023
8 Heath Road,Twickenham,TW1 4BZ, - 31.05.2023
22B Heath Road,Twickenham,TW1 4HG, - 31.05.2023
18C Heath Road,Twickenham,TW1 4HG, - 31.05.2023
16C Heath Road,Twickenham,TW1 4HG, - 31.05.2023
14B Heath Road,Twickenham,TW1 4HG, - 31.05.2023
12B Heath Road,Twickenham,TW1 4HG, - 31.05.2023
8C Heath Road,Twickenham,TW1 4HG, - 31.05.2023
20 Heath Road,Twickenham,TW1 4BZ, - 31.05.2023
22 Heath Road,Twickenham,TW1 4BZ, - 31.05.2023
6 Heath Road,Twickenham,TW1 4HG, - 31.05.2023
18 Heath Road,Twickenham,TW1 4BZ, - 31.05.2023
16 Heath Road,Twickenham,TW1 4BZ, - 31.05.2023
24C Heath Road,Twickenham,TW1 4HG, - 31.05.2023
24B Heath Road,Twickenham,TW1 4HG, - 31.05.2023

20B Heath Road, Twickenham, TW1 4HG, - 31.05.2023
18B Heath Road, Twickenham, TW1 4HG, - 31.05.2023
16B Heath Road, Twickenham, TW1 4HG, - 31.05.2023
14C Heath Road, Twickenham, TW1 4HG, - 31.05.2023
12C Heath Road, Twickenham, TW1 4HG, - 31.05.2023
10C Heath Road, Twickenham, TW1 4HG, - 31.05.2023
10B Heath Road, Twickenham, TW1 4HG, - 31.05.2023
8B Heath Road, Twickenham, TW1 4HG, - 31.05.2023
10 Heath Road, Twickenham, TW1 4BZ, - 31.05.2023
24 Heath Road, Twickenham, TW1 4BZ, - 31.05.2023
39B King Street Parade, King Street, Twickenham, TW1 3SG, - 31.05.2023
37 - 39 King Street Parade, King Street, Twickenham, TW1 3SG, - 31.05.2023
35 King Street Parade, King Street, Twickenham, TW1 3SG, - 31.05.2023
39A King Street Parade, King Street, Twickenham, TW1 3SG, - 31.05.2023
37B King Street Parade, King Street, Twickenham, TW1 3SG, - 31.05.2023
37A King Street Parade, King Street, Twickenham, TW1 3SG, - 31.05.2023
35B King Street Parade, King Street, Twickenham, TW1 3SG, - 31.05.2023
35A King Street Parade, King Street, Twickenham, TW1 3SG, - 31.05.2023
19 Heath Road, Twickenham, TW1 4AW, - 31.05.2023
21 Heath Road, Twickenham, TW1 4AW, - 31.05.2023
10 Poulett Gardens, Twickenham, TW1 4QR, - 31.05.2023
8 Poulett Gardens, Twickenham, TW1 4QR, - 31.05.2023
Flat 1, Poulett Lodge, Cross Deep, Twickenham, TW1 4QJ, - 31.05.2023
Flat 2, Poulett Lodge, Cross Deep, Twickenham, TW1 4QJ, - 31.05.2023
Flat 2, 49A King Street Parade, King Street, Twickenham, TW1 3SG, - 31.05.2023
Flat 1, 49A King Street Parade, King Street, Twickenham, TW1 3SG, - 31.05.2023
1 - 13 Heath Road, Twickenham, TW1 4AW, - 31.05.2023
Unit 3, Cross Deep Court, Heath Road, Twickenham, TW1 4AG, - 31.05.2023
53B King Street Parade, King Street, Twickenham, TW1 3SG, - 31.05.2023
59B King Street Parade, King Street, Twickenham, TW1 3SG, - 31.05.2023
55 King Street Parade, King Street, Twickenham, TW1 3SG, - 31.05.2023
49 King Street Parade, King Street, Twickenham, TW1 3SG, - 31.05.2023
57 King Street Parade, King Street, Twickenham, TW1 3SG, - 31.05.2023
53 King Street Parade, King Street, Twickenham, TW1 3SG, - 31.05.2023
51 King Street Parade, King Street, Twickenham, TW1 3SG, - 31.05.2023
47 King Street Parade, King Street, Twickenham, TW1 3SG, - 31.05.2023
45 King Street Parade, King Street, Twickenham, TW1 3SG, - 31.05.2023
43 King Street Parade, King Street, Twickenham, TW1 3SG, - 31.05.2023
41 King Street Parade, King Street, Twickenham, TW1 3SG, - 31.05.2023
57A King Street Parade, King Street, Twickenham, TW1 3SG, - 31.05.2023
55A King Street Parade, King Street, Twickenham, TW1 3SG, - 31.05.2023
53A King Street Parade, King Street, Twickenham, TW1 3SG, - 31.05.2023
51A King Street Parade, King Street, Twickenham, TW1 3SG, - 31.05.2023
47A King Street Parade, King Street, Twickenham, TW1 3SG, - 31.05.2023
45A King Street Parade, King Street, Twickenham, TW1 3SG, - 31.05.2023
43A King Street Parade, King Street, Twickenham, TW1 3SG, - 31.05.2023
41B King Street Parade, King Street, Twickenham, TW1 3SG, - 31.05.2023
41A King Street Parade, King Street, Twickenham, TW1 3SG, - 31.05.2023
1 Heath Road, Twickenham, TW1 4AW, - 31.05.2023
57C King Street Parade, King Street, Twickenham, TW1 3SG, - 31.05.2023
57B King Street Parade, King Street, Twickenham, TW1 3SG, - 31.05.2023
Flat 10, Addison Court, 15 Heath Road, Twickenham, TW1 4AG, - 31.05.2023
Flat 14, Addison Court, 15 Heath Road, Twickenham, TW1 4AG, - 31.05.2023
Flat 15, Addison Court, 15 Heath Road, Twickenham, TW1 4AG, - 31.05.2023
Flat 16, Addison Court, 15 Heath Road, Twickenham, TW1 4AG, - 31.05.2023
Flat 17, Addison Court, 15 Heath Road, Twickenham, TW1 4AG, - 31.05.2023
Flat 18, Addison Court, 15 Heath Road, Twickenham, TW1 4AG, - 31.05.2023
Flat 19, Addison Court, 15 Heath Road, Twickenham, TW1 4AG, - 31.05.2023
Flat 20, Addison Court, 15 Heath Road, Twickenham, TW1 4AG, - 31.05.2023
Flat 21, Addison Court, 15 Heath Road, Twickenham, TW1 4AG, - 31.05.2023

Flat 7,Addison Court,15 Heath Road,Twickenham,TW1 4AG, - 31.05.2023
 Flat 9,Addison Court,15 Heath Road,Twickenham,TW1 4AG, - 31.05.2023
 Flat 1,Addison Court,15 Heath Road,Twickenham,TW1 4AG, - 31.05.2023
 Flat 2,Addison Court,15 Heath Road,Twickenham,TW1 4AG, - 31.05.2023
 Flat 3,Addison Court,15 Heath Road,Twickenham,TW1 4AG, - 31.05.2023
 Flat 4,Addison Court,15 Heath Road,Twickenham,TW1 4AG, - 31.05.2023
 Flat 5,Addison Court,15 Heath Road,Twickenham,TW1 4AG, - 31.05.2023
 Flat 6,Addison Court,15 Heath Road,Twickenham,TW1 4AG, - 31.05.2023
 2 Cross Deep Court,Heath Road,Twickenham,TW1 4AG, - 31.05.2023
 Flat 14,Canham House,17 Heath Road,Twickenham,TW1 4AW, - 31.05.2023
 Flat 13,Canham House,17 Heath Road,Twickenham,TW1 4AW, - 31.05.2023
 Flat 12,Canham House,17 Heath Road,Twickenham,TW1 4AW, - 31.05.2023
 Flat 11,Canham House,17 Heath Road,Twickenham,TW1 4AW, - 31.05.2023
 Flat 10,Canham House,17 Heath Road,Twickenham,TW1 4AW, - 31.05.2023
 Flat 9,Canham House,17 Heath Road,Twickenham,TW1 4AW, - 31.05.2023
 Flat 8,Canham House,17 Heath Road,Twickenham,TW1 4AW, - 31.05.2023
 Flat 7,Canham House,17 Heath Road,Twickenham,TW1 4AW, - 31.05.2023
 Flat 6,Canham House,17 Heath Road,Twickenham,TW1 4AW, - 31.05.2023
 Flat 5,Canham House,17 Heath Road,Twickenham,TW1 4AW, - 31.05.2023
 Flat 4,Canham House,17 Heath Road,Twickenham,TW1 4AW, - 31.05.2023
 Flat 3,Canham House,17 Heath Road,Twickenham,TW1 4AW, - 31.05.2023
 Flat 2,Canham House,17 Heath Road,Twickenham,TW1 4AW, - 31.05.2023
 Flat 1,Canham House,17 Heath Road,Twickenham,TW1 4AW, - 31.05.2023
 4 Cross Deep,Twickenham,TW1 4QP - 31.05.2023
 Flat 8,Addison Court,15 Heath Road,Twickenham,TW1 4AG, - 31.05.2023
 Flat 11,Addison Court,15 Heath Road,Twickenham,TW1 4AG, - 31.05.2023
 Flat 13,Addison Court,15 Heath Road,Twickenham,TW1 4AG, - 31.05.2023
 6 Poulett Gardens,Twickenham,TW1 4QR, - 31.05.2023
 4 Poulett Gardens,Twickenham,TW1 4QR, - 31.05.2023
 Flat 12,Addison Court,15 Heath Road,Twickenham,TW1 4AG, - 31.05.2023
 Canham House,17 Heath Road,Twickenham,TW1 4AW, - 31.05.2023
 2 Poulett Gardens,Twickenham,TW1 4QR, - 31.05.2023

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

Development Management

Status: PCO

Application:22/3577/FUL

Date:

Change of use of part ground floor and part first floor to form six apartments at Cross Deep Court (Units 3 and 15), Heath Road, Twickenham, TW1 4AG.

Proposal	Change of use of part ground floor and part first floor to form six apartments (4No. 1-bed, 2-person flats and 2No. 2-bed, 4-person flats) at Cross Deep Court (Units 3 and 15), Heath Road, Twickenham, TW1 4AG. In addition to the aforementioned, the proposal would include: works of making good at ground and first floor levels with design and finishes to match the existing; No. 2 windows in keeping the existing ones to the first-floor level of the south elevation that faces the internal car parking area; a new first-floor opening within the arcade; and a new replacing entrance facing the car parking area to the stairwell of Unit 15.
Site description / relevant to the proposal key designations	The application building is a four-storey corner-plot building in a mixture of uses located at the junction of Cross Deep, Heath Road and King Street Parade in Twickenham Village, South Twickenham Ward.

	<p>Unit 3 fronts Cross Deep to the east and comprises a ground-floor entrance door, foyer and staircase leading to a first-floor gym (operated by Escape Fitness). The mezzanine floor used by the gym was inserted as part of planning permission ref. 14/4537/FUL. The remainder of the first floor provides ancillary retail storage to Unit 15 on the ground floor, a ground-floor retail unit fronting Heath Road (operated by Stevensons sports shop).</p> <p>Other uses (outside of the Site red line) include ground-floor commercial units including a pharmacy. The Planning Statement submitted with the application states that there are residential units on the upper floors. The basement comprises a gym (operated by Pure Gym), which was previously occupied by Rileys Snooker Hall. The first floors of Units 3 and 15 and a portion of the ground-floor of Unit 3, is on King Street Parade facing part that is used as an access area, as well as the rear facing internal parking area stairwell going to the first floor of Unit 15, are the areas of the host building that are the subject of this change of use application.</p> <p>The ground floor shops are within the Heath Road Secondary Shopping Frontage (Nos. 1-85 odds) and the Twickenham Main Centre Boundary. It also forms part of the Twickenham Area Action Plan (TAAP).</p> <p>The site falls outside of the designated Key Office Policy Area in Twickenham town centre.</p> <p>There is an Article 4 Direction in place restricting change of use from Class E commercial to residential, Use Class C3.</p> <p>The application property is neither locally or nationally listed nor is it located in a conservation area.</p> <p>The boundary of CA8 Twickenham Riverside Conservation Area is directly opposite the site approx. 20 metres to the east. In addition, Nos. 54 and 60-62 King Street approx. 28 metres directly north are Grade II Listed Buildings. There is also a row of Buildings of Townscape Merit (BTMs) along King Street adjoining the aforementioned listed buildings.</p> <p>The application property is located in an Area of Archaeological Priority (Site: Twickenham and Marble Hill), which is considered not be significantly affected by the proposed scheme given the very nature of such scheme.</p> <p>The site has a Public Transport Accessibility Level (PTAL) of 5, which is considered 'very good' on a scale of 0 to 6b with 0 being worst and 6b being best. Controlled Parking Zone CPZ D - Central Twickenham is in operation at the site Monday to Saturday 8:30am to 6:30pm (Bank and Public holidays free).</p> <p>The Site is in Flood Zone 1 though is in an Area Susceptible to Surface Water Flooding, an Area Susceptible to Groundwater Flooding and a Throughflow Catchment Area.</p>
<p>Relevant Planning History</p>	<p><u>Unit 3</u> 14/4537/FUL - Flexible use of premises for A1, A2, A3, B1(a) (Office), D1(Medical/Health Services, Creche/Day Nursery, Museums and Exhibition Space only) or D2 uses (or a combination of these) - Granted 16/04/2015.</p> <p><u>Relevant conditions attached to this permission:</u> <u>U81757 Specific Use - B1 Use Class</u> <i>The premises hereby approved shall be occupied solely as an office and for no other purpose whether or not within Use Class B1 as specified in the schedule to the Town and Country Planning (Use</i></p>

	<p><i>Classes) Order 1987, or in any provision revoking or re-enacting that order.</i></p> <p><i>REASON: To safeguard local road and parking conditions and residential amenity of nearby occupants.</i></p> <p><u><i>U80798 Specific Use - D1 Use Class</i></u></p> <p><i>The premises hereby approved shall be occupied by a medical/health services/crèche/day nursery/museums/exhibition space and for no other purpose whether or not within Use Class D1 as specified in the schedule to the Town and Country Planning (Use Classes) Order 1987, or in any provision revoking or re-enacting that order.</i></p> <p><i>REASON: To safeguard local road and parking conditions and residential amenity of nearby occupants.</i></p> <p><u><i>U80801 B1 Use – Restriction</i></u></p> <p><i>The B1(a) (office) use hereby approved shall not benefit from the provisions of the Town and Country Planning (General Permitted Development) Order 1995 (or any Order revoking or re-enacting that Order) for the change of use to C3 (residential) use.</i></p> <p><i>REASON: To safeguard the character and appearance of the locality and amenities of the occupiers of adjoining property.</i></p> <p><u><i>U82580 A1 Use – Restriction</i></u></p> <p><i>The A1 use hereby approved shall not benefit from the provisions of the Town and Country Planning (General Permitted Development) Order 1995 (or any Order revoking or re-enacting that Order) for the change of use to C3 (residential) use.</i></p> <p><i>REASON: To safeguard the character and appearance of the locality and amenities of the occupiers of adjoining property.</i></p> <p>Unit 3 is subject to a S106 Agreement restricting parking permit eligibility to one business permit only for the commercial occupier (Blue Badge holders exempt).</p> <p>15/2546/VRC - Variation of condition U81754 (NS02 - No Customers - D1 and D2 Use) and condition U88686 (NS18 - Staff on premises (D1 and D2 Use)) of planning permission 14/4537/FUL dated 16/04/2015 to allow an extension to the existing opening hours as follows: Monday - Friday 8am - 8pm, Saturdays 8am - midday and Sundays, 10am - midday - Granted 12/10/2015.</p>
<p>Policies</p>	<p>The proposal has been considered having regard to the policies within the London Plan and the Council's Local Plan, in particular:</p> <p>London Plan (2021):</p> <ul style="list-style-type: none"> • D12 Fire Safety <p>Local Plan (2018):</p> <ul style="list-style-type: none"> • LP 1 Local Character and Design Quality • LP 8 Amenity and Living Conditions • LP 10 Local Environmental Impacts, Pollution and Land Contamination • LP 20 Climate Change Adaptation • LP 22 Sustainable Design and Construction • LP 24 Waste Management • LP 25 Development in Centres • LP 26 Retail Frontages • LP 28 Social and Community Infrastructure • LP 34 New Housing • LP 35 Housing Mix and Standards

	<ul style="list-style-type: none"> • LP 36 Affordable Housing • LP 41 Offices • LP 44 Sustainable Travel Choices • LP 45 Parking Standards and Servicing <p>Supplementary Planning Documents:</p> <ul style="list-style-type: none"> • Affordable Housing SPD (2014) • Planning Obligation Strategy SPD (2020) • Refuse and Recycling: Storage and Access Requirements for New Developments SPD (2022) • Residential Development Standards SPD (2010) Incorporating Nationally Described Space Standards • Transport SPD (2020) • Sustainable Construction Checklist SPD (2020)
<p>Local Plan (Regulation 19 version)</p>	<p><i>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.</i></p> <p><i>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/t will continue to be applied; in addition, no weight will be given to Policy 39 in relation to the 20% biodiversity net gain requirement at this stage; all other aspects and requirements of these policies will apply.</i></p> <p><i>In this regard, the following Policies are considered Material Planning Considerations in this instance:</i></p> <ul style="list-style-type: none"> • <i>Policy 28 Local character and design quality</i> • <i>Policy 46 Amenity and Living Conditions</i> • <i>Policy 53 Local Environmental Impact</i> • <i>Policy 4 Minimising Greenhouse Gas Emissions and Promoting Energy Efficiency</i> • <i>Policy 6 Sustainable Construction Standards</i> • <i>Policy 7 Waste and the Circular Economy</i> • <i>Policy 18 Development in Centres</i> • <i>Policy 20 Shops and Services Serving Essential Needs</i> • <i>Policy 49 Social and Community Infrastructure</i> • <i>Policy 10 New Housing</i> • <i>Policy 13 Housing Mix and Standards</i> • <i>Policy 11 Affordable Housing</i> • <i>Policy 23 Offices</i> • <i>Policy 47 Sustainable Travel Choices</i>

	<ul style="list-style-type: none"> • <i>Policy 48 Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management</i>
Consultees	<p>Transport: does not object to the scheme (comments are summarised in the main body of this report).</p> <p>Policy: does not object to the scheme (comments are summarised in the main body of this report).</p>
Material representations	None received.
Amendments	None requested or received.
Notes	This submission follows the issued pre-application advice reference: 21/P0448/PREAPP.
Professional comments	<p>The proposal has been assessed in relation to the following issues:</p> <ul style="list-style-type: none"> • Change of Use • Quality of Accommodation • Character and Design • Residential Amenity • Sustainability • Parking, Cycle and Refuse Provision • Fire Safety • Affordable Housing and Community Infrastructure Levy (CIL) <p>Change of Use – Loss of Class E Floorspace</p> <p>As stated above, the application property is within the Twickenham Main Centre Boundary. The supporting policy text 7.1.2 to Policy LP 25 ‘Development in Centres’ of the Local Plan (2018) stipulates that the five main centres “<i>have an important role to play, providing shops, services, employment opportunities, housing and being a focus for community and cultural life</i>”.</p> <p>The supporting policy text 7.1.24 to Policy LP 25 states that “<i>residential development contributes to the overall health of centres and to meeting the Borough’s housing target. There is scope to increase housing stock in the centres, such as through increased densities or introducing housing in upper floors, provided that this does not lead to an unacceptable loss of commercial or community space, and that the commercial or community uses on the ground floor remain of a viable size</i>”.</p> <p>The proposal would align with the objectives of Policy LP 25, due to it would introduce housing on the first floor of the application property, that would not lead to the unacceptable loss of this space as commercial space. This is evidenced by the submitted <i>Open Market Appraisal</i>, which states that “<i>the first-floor commercial space is beyond its economic usefulness. We ascribe this to a number of factors: poor design and access, the lack of visible marketing opportunities, the oversupply of similar commercial space in the town, the lack of any parking, the growth in online shopping and last mile delivery services and the exorbitant business rates</i>”. In addition, the retail units on the ground floor would remain as existing.</p> <p>The application property is within the Heath Road Secondary Shopping Frontage. Policy 26B ‘Retail Frontages’ highlights that “<i>A non-A1 proposal will be acceptable in the secondary shopping frontages only if it:</i></p> <ol style="list-style-type: none"> 1. (a) <i>meets community needs (such as a dentist, clinic or health centre, veterinary surgery, gym, fitness studio and facilities which would enable the public better access to police services) and provides a direct service to visiting members of the public, or</i>

<p>1. (b) falls within Use Classes A2 to A5, or 1. (c) is another commercial use which provides a direct service to visiting members of the public without appointment”.</p> <p>Further requirements are set out in Sections 2 to 4 of this Policy, namely:</p> <p>“2. the proposed use should retain a 'shop-like' appearance; it should not have a detrimental visual impact on the shopfront and should respect the heritage and character of the centre, taking into account the Village Planning Guidance SPDs;</p> <p>3. the proposed use has to be complementary to the area’s shopping function and provide a direct service to the public; and</p> <p>4. it will not create an unbroken run of three or more non-A1 units”.</p> <p>Part F of Policy LP 26 mentions that “where a proposal involves a change of use not supported by policy, the Council will require satisfactory evidence of full and proper marketing of the site”.</p> <p>Supporting policy text 7.2.8 to Policy LP 26 states that “this policy primarily protects the ground floor. It does not apply to a separate unit located to the rear of a unit fronting the main shopping street. It is acknowledged that there may be scope to convert floorspace (including ancillary space) to other uses, provided that the commercial or community use on the ground floor remains of a viable size and that this does not lead to an unacceptable loss of commercial or community space on upper floors. For retail premises, sufficient ancillary space should be retained”.</p> <p>The proposal would aim to only convert the first floor of the application property into a residential space and therefore such proposal would align with Policy LP 26. As stated above, this conversion would not lead to the unacceptable loss of this space as commercial space, which is evidenced by the submitted <i>Open Market Appraisal</i>, as well as the retail units on the ground floor would remain as existing.</p> <p>Policy LP 28C ‘Loss of social or community infrastructure’ of the Local Plan (2018) points out that:</p> <p>“loss of social or community infrastructure will be resisted. Proposals involving the loss of such infrastructure will need to demonstrate clearly:</p> <ol style="list-style-type: none"> 1. that there is no longer an identified community need for the facilities or they no longer meet the needs of users and cannot be adapted; or 2. that the existing facilities are being adequately re-provided in a different way or elsewhere in a convenient alternative location accessible to the current community it supports, or that there are sufficient suitable alternative facilities in the locality; and 3. the potential of re-using or redeveloping the existing site for the same or an alternative social infrastructure use for which there is a local need has been fully assessed. This should include evidence of completion of a full and proper marketing exercise of the site for a period of at least two consecutive years in line with the requirements set out in Appendix 5”. <p>Part D of this Policy states that “where the Council is satisfied that the above evidence has been provided and the change of use away from social and community infrastructure use has been justified, redevelopment for other employment generating uses or affordable housing should be considered”.</p>
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<p>The requirements of Policy LP 28 would be covered by the submitted <i>Open Market Appraisal</i>, and these will be discussed in turn below.</p> <p>1 and 2. The first floor of the application property would add to <i>“the oversupply of similar commercial space in Twickenham”</i>, with <i>“the town continuing to suffer from widespread and prolonged vacancies for retail”</i>. As such, there would be no longer an identified community need.</p> <p>3. The submitted <i>Open Market Appraisal</i> is accompanied by a <i>Sequential testing under E Use Class</i>, where it has been looked at the likelihood of an alternative use under the expanded Use Class E. The test highlights the limits currently experienced by <i>“re-using or redeveloping the existing site for the same or an alternative social infrastructure use for which there is a local need”</i>. These limits would be the current trends appreciated by the High Street, including vacant premises, exacerbated by Brexit, and e-commerce, the physical constraints of the first floor of the application property, the uses of other floors of the host building, and the fact that <i>“there is currently some 750,000 sq. ft. of void office in LBRUT”</i>. The submitted <i>Open Market Appraisal</i> is also accompanied by a marketing exercise of the site for a period of at least two consecutive years broadly in line with the requirements set out in Appendix 5 of the Local Plan (2018). The marketing exercise concludes that the premises has attracted interest, but with no offers.</p> <p>Policy LP 41A ‘Retention of offices’ of the Local Plan (2018) mentions that <i>“there is a presumption against the loss of office floorspace in all parts of the borough”</i>.</p> <p>The proposed <i>Open Market Appraisal</i> states that <i>“there is currently some 750,000 sq. ft. of void office in LBRUT”</i> and consequently the loss of office space associated with the proposal is given limited weight.</p> <p>Policy LP 34A of the Local Plan (2018) emphasizes that <i>“the Council will exceed the minimum strategic dwelling requirement, where this can be achieved in accordance with other Local Plan policies”</i>.</p> <p>London Plan (2021) Policies H1 ‘Increasing housing supply’ and H2 ‘Small sites’ set the general expectation for increasing housing supply with the supporting policy text 4.2.4 stating that <i>“incremental intensification of existing residential areas within PTALs 3-6 or within 800m distance of a station or town centre boundary is expected to play an important role in contributing towards the housing targets”</i>.</p> <p>The proposal would boost the Council’s current housing supply and would be located in a sustainable location, being within 800 metres from Twickenham Station. Furthermore, the application site presents a PTAL score of 5, where a score of 0 is very poor access to public transport, and 6b is excellent access to public transport.</p> <p>In light of the above, and the need for boosting housing supply supported and emphasized by national policy, the residential conversion sought by the proposal, when assessed against the adopted Local Plan (2018) and London Plan (2021), is considered to be justified.</p> <p>Quality of accommodation</p> <p>Policy 35A of the Local Plan (2018) states that <i>“development should generally provide family sized accommodation, except within the five main centres and Areas of Mixed Use where a higher proportion of small units would be appropriate. The housing mix should be</i></p>
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appropriate to the site-specifics of the location". The scheme is proposing 2x2B4P and 4x1B2P, which are considered small units, within a main centre location, and therefore would align with the policy objective.

Policy LP 35B of the Local Plan (2018) requires conversions to comply with the Nationally Described Space Standard 2015 (NDSS). The minimum standards are listed below:

- The dwelling provides at least the gross internal floor area and built-in storage area set out in Table 1 below.
- a dwelling with two or more bedspaces has at least one double (or twin) bedroom.
- A double should be 11.5sqm and 2.75m wide.
- Head height should be at least 2.3m for a minimum of 75% of the gross internal floor area.
- Suitable storage space to be incorporated into units.

Number of bedrooms (b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) *			1.0
1b	2p	50	58		1.5
2b	3p	61	70		2.0
2b	4p	70	79		2.0

The proposal would provide 6 units/flats, namely:

- Unit 1 - 2B4P - approx. 81.9m²
- Unit 2 - 1B2P - approx. 59m²
- Unit 3 - 2B4P - approx. 79.7m²
- Unit 4 - 1B2P - approx. 51m²
- Unit 5 - 1B2P - approx. 61.2m²
- Unit 6 - 1B2P - approx. 50.5m².

The units would meet the minimum gross internal floor areas and storages and the aforementioned minimum standards.

Policy LP 35C and D and the Residential Development Standards SPD (2010) apply to external amenity space, of which there is none included within the proposal.

This SPD states that *"to provide adequate private amenity space, the Council will encourage a minimum of 5 sqm of private outdoor space for 1-2 person dwellings plus an extra 1 sqm should be provided for each additional occupant"*. As such, Units 1 and 3 would require 7 sqm and the remaining Units 5 sqm. This is reiterated by Policy D6 'Housing quality and standards' of the London Plan (2021) and the emerging *Richmond Local Plan 'The best for our borough' Draft for consultation*.

The Mayor of London SPD 'Housing Design Quality and Standards' states that *"in very exceptional circumstances, where site conditions make it impossible to provide private outside space for all dwellings, a proportion of dwellings in a development may instead be provided with additional internal living space equivalent to the private open space requirement, added to the minimum GIA and the minimum*

<p><i>combined living area of the dwelling. Justification will need to be made as to why external private outside space cannot be provided".</i></p> <p>In applying the aforementioned London SPD, it is noted that there would be a shortfall of approx. 4 sqm in relation to Unit 4 and approx. 3.2 sqm in relation to Unit 6.</p> <p>It is also noted that outdoor amenity space could be difficult to provide above commercial premises. The creation of additional amenity space would involve additional balconies which would impact on the building design and would also bring into question structural considerations. Public amenity space is within easy walking distance - Diamond Jubilee Gardens, Radnor Gardens. Considering the minor shortfall and availability of alternatives the lack of sufficient outdoor amenity space is acceptable in these specific circumstances.</p> <p>Character and Design / Heritage Assets</p> <p>Policy LP 1 'Local Character and Design Quality' of the Local Plan (2018) 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.</p> <p>The proposal would include relatively minor external additions and alterations, as per the above description of such proposal, which would be in keeping with the current design of the application property. In doing so, the proposed scheme is considered to be in line with Policy LP 1 of the Local Plan (2018).</p> <p>It is anticipated that given the change of use nature of this application and the position and separation distances of the relatively minor alterations proposed with it, the proposal would have a neutral impact over the setting of any heritage assets in the surroundings.</p> <p>Residential Amenity</p> <p>Policy LP 8 'Amenity and Living Conditions' of the Local Plan (2018) outlines that all development will be required to protect the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties.</p> <p>The current mass, size and scale of the host property would be unaltered as a result of the proposed scheme and therefore exacerbated loss of light and overbearing issues beyond the ones currently experienced on site are anticipated to be minimal.</p> <p>Turning to overlooking issues, the additional windows at first-floor level would not significantly exacerbate current actual and perceived loss of privacy, given the presence of existing first-floor window openings that are proportionally bigger to the ones proposed here.</p> <p>It is anticipated that the occupiers of the 6 Units would not experience significant amenity issues in terms of noise and nuisance, given the locality would appear mixed in nature with residential premises and uses, which can be carried out in a residential area without detriment to its amenity. In addition, the new occupiers would benefit from good standards of daylight, sunlight and ventilation, due to the number of apertures at their disposal and the orientation of the application property.</p> <p>Policy LP 10G 'Local Environmental Impacts, Pollution and Land Contamination' of the Local Plan (2018) states that <i>"the Council will</i></p>
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<p><i>seek to manage and limit environmental disturbances during construction and demolition as well as during excavations and construction of basements and subterranean developments. To deliver this the Council requires the submission of Construction Management Statements (CMS) for developments of sites in confined locations or near sensitive receptors".</i> The submitted CMS is not considered to provided satisfactory details to mitigate concerns arising from the construction activities. As such, a CMS will be requested via a pre-commencement condition, agreed in writing by the applicant.</p> <p>Sustainability</p> <p>Policy LP 22 'Sustainable Design and Construction' of the Local Plan (2018) outlines that <i>"developments will be required to achieve the highest standards of sustainable design and construction to mitigate the likely effects of climate change. Applicants will be required to complete the following:</i></p> <p><i>A1. Development of 1 dwelling unit or more will be required to complete the Sustainable Construction Checklist SPD (2020)".</i> Policy Note 6.3.2 states that <i>"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".</i></p> <p>Policy LP 22 goes on to state that:</p> <p><i>"A2. Development that results in a new residential dwelling, including conversion and change of use, will be required to incorporate water conservation measures to achieve maximum water consumption of 110 litres per person per day for homes (including an allowance of 5 litres or less per person per day for external water consumption).</i></p> <p><i>A4. Proposals for change of use to residential will be required to meet BREEAM Domestic Refurbishment 'Excellent' standard (where feasible)".</i></p> <p>Part B of Policy LP 22 points out that <i>"developers are required to incorporate measures to improve energy conservation and efficiency as well as contributions to renewable and low carbon energy generation. All other new residential buildings should achieve a 35% reduction in carbon dioxide emissions".</i></p> <p>The applicant submitted a <i>Sustainable Construction Checklist</i> accompanied by the <i>Energy Strategy Report</i>, by Syntegra Consulting, which states that <i>"the study results showed that efficient thermal performance building fabric and heating systems are keys to achieve building regulations compliance. Moreover, ASHP (Air Source Heat Pump) technology proved to be a major measure to achieve over 40% reductions beyond Part L requirements".</i> No details have been provided in relation to the ASHP (Air Source Heat Pump), which will be requested via a reasonable and necessary planning condition. In addition, the proposal would meet BREEAM Domestic Refurbishment 'Excellent' standard, as evidenced by <i>BREEAM Refurbishment Domestic Buildings Pre-Assessment Report</i>, by Syntegra Consulting.</p> <p>Turning to Part A2 of Policy LP 22, the proposal has not been accompanied by details that would allow to ascertain its compliance with it. Therefore, these details and compliance will be requested via a reasonable and necessary planning condition.</p> <p>Parking, Cycle and Refuse Provision</p>

<p>Policy LP 45 'Parking Standards and Servicing' outlines that <i>"the Council will require new development to make provision for the accommodation of vehicles in order to provide for the needs of the development while minimising the impact of car-based travel including on the operation of the road network and local environment and ensuring making the best use of land"</i>.</p> <p>Part 1 of this Policy states that <i>"the Council will Requiring new development to provide for car, cycle, 2 wheel and, where applicable, lorry parking and electric vehicle charging points, in accordance with the standards set out in Appendix 3. Opportunities to minimise car parking through its shared use will be encouraged"</i>.</p> <p>Part 3 of Policy LP 45 highlights that <i>"car free housing developments may be appropriate in locations with high public transport accessibility, such as areas with a PTAL of 5 or 6, subject to:</i></p> <ol style="list-style-type: none"> <i>a. the provision of disabled parking;</i> <i>b. appropriate servicing arrangements; and</i> <i>c. demonstrating that proper controls can be put in place to ensure that the proposal will not contribute to on-street parking stress in the locality. All proposals for car free housing will need to be supported by the submission of a Travel Plan"</i>. <p>The application site is in a Controlled Parking Zone: D - Central Twickenham, Times: Monday to Saturday 8:30am to 6:30pm (Bank and Public holidays free).</p> <p>As stated above, such application site presents a PTAL score of 5, where a score of 0 is very poor access to public transport, and 6b is excellent access to public transport. Therefore, a car free housing development, as the one proposed as part of this application, is acceptable, subject to a pre-commencement condition, agreed in writing by the applicant, preventing occupiers of the flats from obtaining residents parking permits.</p> <p>Policy LP 24 'Waste Management' of the Local Plan (2018), the Council's Residential Development Standards SPD (2015) and the Council's Refuse and Recycling: Storage and Access Requirements for New Developments SPD (2022) require that secure storage be provided on-site for refuse and recycling bins.</p> <p>Further details in relation to cycle parking provision and bin store facilities will be requested via a reasonable and necessary planning condition.</p> <p>Fire Safety</p> <p>The submitted Planning Fire Safety Strategy is considered sufficient to satisfy Policy D12 of the London Plan (2021), therefore, a compliance condition is attached.</p> <p>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.</p> <p>Affordable Housing and CIL</p> <p>Policy LP 36 'Affordable Housing' of the Local Plan (2018) requires <i>"a contribution towards affordable housing on all housing sites"</i>.</p> <p>The applicant submitted a <i>Viability Report</i> by <i>Dr Andrew Golland BSc (Hons) PhD MRICS Andrew Golland Associates</i>, which has been independently reviewed by the Council's external viability consultant.</p> <p>The review concluded that <i>"the scheme is not viable and could not support additional affordable housing or S.106 contributions"</i>.</p>

	<p>However, the development is CIL liable, namely the independent consultant states that <i>“we have prepared our appraisal and report on the assumption of a CIL liability of £33,794 and the Council should check this is correct”</i>.</p> <p>As such, the proposal is CIL liable and an informative for the applicant will be attached to any consent in this regard.</p>
<p>Recommendation</p>	<p>It is recommended that the application reference 22/3577/FUL be granted approval subject to conditions and informatives.</p>

Recommendation:

The determination of this application falls within the scope of Officer delegated powers - **YES**

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): GAP

Dated: 29/02/2024

I agree the recommendation: CTA

Team Leader/Head of Development Management/Principal Planner

Dated: 25/06/2024.....

This application has been subject to representations that are contrary to the officer recommendation. The Head of Development Management has considered those representations and concluded that the application can be determined without reference to the Planning Committee in conjunction with existing delegated authority.

Head of Development Management:

Dated:

<p>REASONS:</p>
<p>CONDITIONS:</p>
<p>INFORMATIVES:</p>

UDP POLICIES:
OTHER POLICIES:

The following table will populate as a quick check by running the template once items have been entered into Uniform

SUMMARY OF CONDITIONS AND INFORMATIVES

CONDITIONS

INFORMATIVES
