



**The Trustees of Hampton School
Trust**

Planning, Design and Access Statement

**Change of Use of the Old
Vicarage, 5 Church Street,
Hampton from Use Class
C4 to Sui Generis**

Final report

Prepared by LUC
September 2024

The Trustees of Hampton School Trust

Planning, Design and Access Statement

Change of Use of the Old Vicarage, 5 Church Street, Hampton from Use Class C4 to Sui Generis

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250 Waterloo Road
London SE1 8RD

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Chapter 1

Introduction and Context

1.1 This Planning Statement has been prepared by LUC on behalf of The Trustees of Hampton School Trust ('the Applicant') to accompany an application for full planning permission for the following development at the Old Vicarage, 5 Church Street, Hampton, TW12 2EB, within the London Borough of Richmond upon Thames (LBRuT):

“Change of use from Use Class C4 (small house in multiple occupation) to Sui Generis (large house in multiple occupation) for use by up to 14 people.”

Site Location

1.2 The application site ('the site') is located to the north of Thames Street (A308) and south / west of Church Street (A311), in Hampton. Thames Street runs immediately adjacent to the southern boundary of the site. St Mary's Parish Church is located to the west of the site, St Mary's Church Community Hall is located to the north and there are a number of residential properties located to the east, including 1 Church Street and 2-6 Thames Street.

1.3 The site is accessed from Church Street to the north.

1.4 Hampton Railway Station is located approximately 0.6 miles to the west and can be accessed on foot in approximately 13 minutes. There are also a number of bus stops within 300m of the site, including:

- Hampton Church (Stop T)
- Hampton Church (Stop N)
- Garrick Villa (Stop P)
- Hampton Thames Street (Stop H)

1.5 These bus stops provide access to Molesey, Hampton Hill, Teddington, Twickenham, Richmond, Kingston upon Thames, Ashford, Staines upon Thames, Hounslow and Heathrow Airport Central.

1.6 There are also a number of local amenities within a mile of the site, including supermarkets, butchers, convenience stores, restaurants, cafes and pubs.

Application Site

1.7 The site comprises two semi-detached houses; the Old Vicarage and the Annexe, a driveway providing access from

the north, off Church Street, a parking area to the north of the house, a cycle store located to the east of the house and gardens surrounding the house.

1.8 The Old Vicarage has nine bedrooms. Both the Old Vicarage and the Annexe currently operate as houses in multiple occupation (HMO) each for up to six people.

1.9 5 Church Street is not listed, however, it is identified on the LBRuT interactive map as a Building of Townscape Merit. 2-6 Thames Street are grade II listed. The site is located within the Hampton Village conservation area.

1.10 The site is located in Flood Zone 1 and has a low probability of flooding from rivers and the sea.

1.11 The trees on the site are protected given the site is located within a conservation area.

Proposed Development

1.12 The proposal includes the change of use of the Old Vicarage from Use Class C4 to Sui Generis, to allow the building to be used as a HMO for up to 14 people.

1.13 The School has reviewed its operational requirements and now seeks to use the Old Vicarage for up to 14 people as affordable accommodation for School staff who work at the three Hampton schools, which are all located in Hampton.

Planning History

1.14 Details of the most relevant planning application is listed below:

- **20/2940/FUL:** Conversion of two existing vacant dwellings to provide eight standalone discounted rental flats for employees of Hampton School. (Withdrawn: 16 June 2022).

Chapter 2

Design and Access Statement

2.1 This chapter outlines the proposed design and access context of the proposed scheme.

Use and Amount

2.2 The Old Vicarage will continue to operate as a HMO, however, the use of the building is proposed to change from Use Class C4 to Sui Generis to allow an increase in occupants from six to 14. The building has nine bedrooms, noting that some bedrooms could be used as double occupancy rooms, therefore the application seeks permission for use of the building as a HMO for up to 14 people.

Layout, Scale and Appearance

2.3 The proposal does not include any external changes to either the building or the site.

Access and Parking

2.4 The entrance to the site is to the north, off Church Street and this is the vehicular and pedestrian access point into the site. The existing access arrangements will remain as existing.

2.5 There are currently eight no. car parking spaces within the application site, which will be retained for use by the Old Vicarage and the Annexe. There is also an existing cycle store located to the east of the house, which provides storage for eight no. bikes and additional storage for 11 no. bikes is also provided.

Landscaping

2.6 No changes to the existing landscaping are proposed and no trees are proposed for removal.

Waste and Recycling

2.7 Waste and recycling bins are stored within the site boundary and the collection of waste and recycling will remain as existing.

Chapter 3

Planning Policy Context

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

3.2 This section outlines the relevant planning policy and guidance, identifying the key considerations which should be taken into account when determining the application.

Statutory Development Plan

3.3 The statutory development plan for the application comprises:

1. The London Borough of Richmond upon Thames Local Plan (2018); and
2. The London Plan (2021).

London Borough of Richmond upon Thames Local Plan

3.4 The LBRuT Local Plan was adopted in July 2018. The following policies from the LBRuT Local Plan are considered relevant to the application:

- **Policy LP4: Non-Designated Heritage Assets** – states the Council will seek to preserve, and where possible enhance, the significance, character and setting of non-designated heritage assets, including Buildings of Townscape Merit,
- **Policy LP8: Amenity and Living Conditions** – requires development proposals to protect the living conditions and amenity of occupants of new, existing and adjoining neighbouring buildings as far as possible from the unreasonable impacts of new development. Consideration should be given to impacts on daylight, sunlight, solar glare, visual intrusion, privacy, outlook, noise.
- **Policy LP24: Waste Management** – states all developments, including conversions and changes of use are required to provide adequate refuse and recycling storage space and facilities, which allows for ease of collection and which residents and occupiers can easily access
- **Policy LP34: New Housing** – outlines the Borough's housing target for the period of 2015 – 2025.

- **Policy LP35: Housing Mix and Standards** – requires new residential development to provide a mix of housing types and all new housing development should comply with the Nationally Described Space Standards. All new development should provide adequate external space.
- **Policy LP37: Housing Needs of Different Groups** – states the loss of housing will be resisted unless in a limited number of circumstances. Planning permission will be granted for new accommodation where housing is providing for an identified local need, across a range of tenures, providing they are on a site and in a location suitable for that particular use, and in accordance with environmental, transport, parking and other relevant policies.
- **Policy LP44: Sustainable Travel Choices** - requires the provision of a Transport Statement for minor development. Development proposals should not have a severe impact on the operation, safety or accessibility to the local or strategic highway network. Development should maximise opportunities for safe and convenient access to public transport and should promote walking and cycling.
- **Policy LP45: Parking Standards and Servicing** – sets out car and cycle parking standards.
- **Policy D12: Fire Safety** - requires developments to achieve the highest standards of fire safety.
- **Policy D14: Noise** - requires developments to reduce, manage and mitigate noise to improve health and quality of life. Significant adverse noise impacts should be avoided.
- **Policy T4: Assessing and Mitigating Transport Impacts** - states that when required transport statements should be submitted with development proposals to ensure that any impacts on the transport network are fully assessed.
- **Policy T5: Cycle** - sets out minimum cycle parking standards.
- **Policy T6: Car Parking** – sets out maximum car parking standards.
- **Policy T6.1: Residential Parking** – states new residential development should not exceed the maximum parking standards set out in London Plan 'Maximum residential parking standards'.

The London Plan

3.5 The London Plan was adopted in March 2021 and sets out the spatial development strategy for London, providing a framework for the development and use of land over the next 20-25 years. It provides a strategic, London-wide policy context within which boroughs should set their local planning policies.

3.6 A number of policies in the London Plan are of relevance to the proposed scheme, as outlined below:

- **Policy H1: Increasing Housing Supply**- outlines the requirements which London Boroughs must adhere to increase housing supply in the city.
- **Policy H9: Ensuring the Best use of Housing Stock** – states boroughs should promote efficient use of existing housing stock to reduce the number of vacant and under-occupied dwellings and should take account of the role of HMOs in meeting local and strategic housing need.
- **Policy HC1: Heritage Conservation and Growth** – states development proposals affecting heritage assets, and their settings, should conserve their significance.
- **Policy D6: Housing Quality and Standards** – requires new housing development to be of high design quality and adhere to relevant space standards. All new development should provide adequate external space.

Other Material Considerations

National Planning Policy Framework

3.7 The National Planning Policy Framework (NPPF), last updated in December 2023, provides an overarching framework for the production of local policy documents. The NPPF does not change the statutory status of the development plan as the starting point for decision making, stating that a proposed development that accords with an up to date Local Plan should be approved.

3.8 At the heart of the NPPF is a presumption in favour of sustainable development. In assessing and determining development proposals, Local Planning Authorities should apply the presumption in favour of sustainable development.

3.9 The following chapters of the NPPF are considered relevant to the application:

- **Chapter 5:** Delivering a sufficient supply of homes.
- **Chapter 9:** Promoting sustainable transport.
- **Chapter 10:** Supporting high quality communications.
- **Chapter 11:** Making effective use of land.

3.10 On the 30th July 2024 the Government published a new draft NPPF for consultation which will be open until 24th September 2024. There was no specific mention of HMO property in the consultation. Promoting mixed tenure development was supported in the consultation.

London Borough of Richmond upon Thames Draft Local Plan

3.11 LBRuT are in the final stages of preparing a new Local Plan. The draft Local Plan is currently at examination stage and is currently programmed for adoption in the winter of 2024 / 2025.

3.12 The following policies set out in the draft Local Plan are considered relevant to the proposed scheme:

- **Policy 10: New Housing** – outlines the Borough’s housing target for the plan period.
- **Policy 12: Housing Needs of Different Groups** – states the loss of housing will be resisted unless in a limited number of circumstances. Planning permission will be granted for new accommodation where housing is providing for an identified local need, across a range of tenures, providing they are on a site and in a location suitable for that particular use, and in accordance with environmental, transport, parking and other relevant policies.
- **Policy 13: Housing and Standards** – requires new residential development to provide a mix of sizes and types of accommodation. All new housing development, including conversions, are required to comply with the Nationally Described Space Standard. All new housing development, including conversions, should provide adequate external space.
- **Policy 30: Non-Designated Heritage Assets** – states the Council will seek to preserve and where possible enhance the significance, character and setting of non-designated heritage assets, including Buildings of Townscape Merit.
- **Policy 44: Design Process** – states developments should achieve the highest standards of fire safety in accordance with the London Plan Policy D12.
- **Policy 46: Amenity and Living Conditions** – states that all development will be required to protect the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties.
- **Policy 47: Sustainable Travel Choices** – states proposed developments should not have a severe impact on the operation, safety, or accessibility of the local or strategic road network.
- **Policy 48: Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management** – requires new development to make provision for the accommodation of vehicles to provide for the needs of the development while minimising the impact of car-based travel.

Supplementary Planning Documents

London Borough of Richmond upon Thames Housing Act 2004 HMO Licensing Policy

3.13 This document outlines how the LBRuT fulfils its responsibilities of the Housing Act 2004 which introduced a mandatory licensing system for certain types of houses in multiple occupation.

Planning Practice Guidance

3.14 Planning Practice Guidance is a web-based resource created by DCLG and launched in March 2014. The guidance adds further context to the NPPF and it is intended that the two documents be read together. Local Planning Authorities must have regard to advice contained within the guidance, which is also a material consideration when making decisions on planning applications.

Environment Act (2021)

3.15 Biodiversity Net Gain (BNG) became mandatory on 12 February 2024 under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). Developers must deliver a BNG of 10%. This means a development will result in more or better quality natural habitat than there was before development.

3.16 There are a limited number of exemptions to the mandatory BNG requirement. The proposal falls under the de minimis exemption as the development would not impact a priority habitat and impacts less than 25sqm of onsite habitat or 5m of linear habitats.

Chapter 4

Planning Assessment

Principle of Development

4.1 The Old Vicarage is an established residential property operating as a HMO and will continue to be used as such. The proposal will not result in any external changes to the building or the site and proposes to increase the number of people that can reside in the building, from six to 14.

4.2 There is an identified need for more homes in London, as set out at policy H1 of the London Plan. Policy H9 of the London Plan states boroughs should promote efficient use of existing housing stock to reduce the number of vacant and under-occupied dwellings and should take account of the role of HMOs in meeting local and strategic housing need.

4.3 Policy LP37 of the LBRuT Local Plan and policy 12 of the LBRuT draft Local Plan state planning permission should be granted for new accommodation where housing is provided for an identified local need, across a range of tenures, providing they are on a site and in a location suitable for that particular use, and in accordance with environmental, transport, parking and other relevant policies. Para 17.63 of the LBRuT draft Local Plan states:

“Houses in multiple occupation (HMOs) can provide a valued source of cheaper accommodation, particularly for young and transient groups in the population, who have not reached a stage where they can or want to buy, for people who are unable to gain access to other forms of housing and for people who would otherwise be homeless. HMOs can reduce pressure on other elements of the housing stock.”

4.4 The proposal will allow the Old Vicarage to be used by up to 14 people, therefore providing accommodation for up to a further eight people in a sustainable location. The site is well connected by public transport, with a range of amenities within close proximity. The size of the building, bedrooms and site will ensure the living standards of occupants are acceptable. There is adequate car and cycle parking on site to accommodate an increase in occupants. Both points are covered in more detail below.

4.5 5 Church Street is a Building of Townscape Merit and should be preserved in line with policy HC1 of the London Plan, policy LP4 of the LBRuT Local Plan and policy 30 of the LBRuT draft Local Plan. The proposal does not include any external alterations to the building or site, the application seeks a change of use of the Old Vicarage only. Therefore the

proposal will not result in a detrimental impact on the significance, character or setting of the non-designated heritage asset.

4.6 The principle of development is therefore considered acceptable in accordance with policies H1, H9 and HC1 of the London Plan, policies LP4 and LP37 of the LBRuT Local Plan and policies 12 and 30 of the LBRuT draft Local Plan.

Space Standards

4.7 Policy D6 of the London Plan, LP35 of the LBRuT Local Plan and policy 13 of the LBRuT draft Local Plan state new housing development, including conversions, should meet the Nationally Described Space Standards.

4.8 The proposal complies with the Nationally Described Space Standards and the key points are listed below:

- The total floor area of the building far exceeds the minimum requirement of a 246sqm gross internal floor area (GIA) (and 6.5sqm of storage)¹.
- All rooms within the building will be double rooms, at least one bedroom will have a width of 2.75m and all other rooms will have a minimum width of 2.55m.
- The minimum floor to ceiling height is at least 2.5m for at least 75% of the gross internal area of the building.
- The minimum requirement of 17sqm of private outdoor space is provided in the form of gardens surrounding the house.

4.9 In addition to the above points, the building includes a large communal living room and large kitchen on the ground floor. There is also a second kitchen on the second floor.

4.10 The existing building is large enough to accommodate 14 occupants and far exceeds the Nationally Described Space Standards in relation to the total GIA of the building, individual bedroom sizes, ceiling heights and outdoor space. Two large communal areas are included at ground floor level and one at second floor level and there is a large garden which wraps around the building which provides sufficient outdoor space for occupants. The proposal is therefore considered to comply with policy D6 of the London Plan, LP35 of the LBRuT Local Plan and policy 13 of the LBRuT draft Local Plan.

Transport, Access and Parking

4.11 Policy LP44 of the LBRuT Local Plan and policy 47 of the LBRuT draft Local Plan state development proposals should not have a severe impact on the operation, safety or accessibility to the local or strategic highway network.

Development should maximise opportunities for safe and convenient access to public transport and should promote walking and cycling.

4.12 A Transport Statement has been prepared by LUC. The site is considered to be in a sustainable location with adequate public transport access and opportunities for active travel. Future residents will be able to make everyday journeys without the need to use a private motor vehicle.

4.13 It is considered that the proposed development will provide safe access to the site for all, and that car and cycle parking provision strikes the correct balance to encourage sustainable travel and reduce car dependency.

4.14 A trip generation assessment has determined that there will be a negligible increase in person trips as a result of the proposal and no overall increase in the number of vehicle movements.

4.15 The proposal is therefore considered to be acceptable in transport terms and will only have a negligible impact on the existing transport network. The proposal therefore complies with policies LP44 of the LBRuT Local Plan and 47 of the LBRuT draft Local Plan.

Parking

4.16 Policy LP45 of the LBRuT Local Plan sets out car and cycle parking standards. However, the most up to date car and cycle parking standards are the maximum car parking standards and minimum cycle parking standards set out by policies T5, T6 and T6.1 of the London Plan and policy 48 of the draft Local Plan, which is in accordance with the London Plan.

4.17 There are currently eight no. car parking spaces and a further 11 no. spaces will be provided on site. This level of cycle parking is in accordance with the London Plan minimum standards.

4.18 There are eight no. car parking spaces within the site to serve both the Old Vicarage and the Annexe. This is equivalent to 0.62 spaces per unit and falls within the maximum London Plan standard of 0.75 spaces per dwelling for the Outer London PTAL 2 area. One of the spaces will be dimensioned as a disabled parking bay and two no. EV charging points have already been installed. The remainder will be passive EV spaces, able to be activated at a later date.

4.19 The level of car and cycle parking is considered an appropriate level or the use of the building by up to 14 people, especially taking account of how well connected the site is by public transport. The proposal is therefore in accordance with

¹ The Nationally Described Space Standards provide minimum gross internal floor areas and storage based on number of bedrooms, bedspaces and storeys and provide standards for dwellings up to 6 bedrooms. As this proposal is for a HMO which includes 9 bedrooms,

we have combined the minimum space standards for a 6 bedroom three storey dwelling and a 3 bedroom 3 storey dwelling to arrive at these figures.

policies T5, T6 and T6.1 of the London Plan and policy 48 of the LBRuT draft Local Plan.

Fire Strategy

4.20 London Plan policy D12 states that all developments must achieve the highest standards of fire safety and sets out six requirements which must be met. A Fire Safety Strategy and Compliance Report has been prepared by Adena Fire Safety Services Ltd which addresses each of the six requirements. A summary is provided below:

1. No changes are proposed to access and therefore existing fire appliance access remains unchanged and is taken to remain adequate. Firefighting equipment will be provided to comply with article 13 of the Regulatory Reform (Fire Safety) Order 2005 (RRO) and will be sufficient to safeguard the safety of relevant persons.
2. A suitable evacuation assembly point is included in the emergency plan and suitably signposted.
3. The premises has a comprehensive automatic fire detection and warning system installed as well as having a protected means of escape route.
4. Traditional construction that is subject to reasonable maintenance and upkeep will provide an adequate level of compartmentation.
5. All floors are served by a single stair providing a simple escape route without excessive travel distances. The simultaneous evacuation strategy is supported by a comprehensive fire detection and warning system.

4.21 The proposal is therefore in accordance with policy D12 of the London Plan and policy 44 of the LBRuT draft Local Plan.

Other Issues

Residential Amenity

4.22 Policy LP8 of the LBRuT Local Plan and policy 46 of the LBRuT draft Local Plan requires development proposals to protect the living conditions and amenity of occupants of new, existing and adjoining neighbouring buildings as far as possible from the unreasonable impacts of new development. Consideration should be given to impacts on daylight, sunlight, solar glare, visual intrusion, privacy, outlook, noise.

4.23 The proposal does not include any external changes to the building and therefore the change of use of the building is not considered to result in an unacceptable impact in relation to daylight, sunlight, solar glare, visual intrusion, privacy or outlook compared to the existing use of the building.

4.24 An increase in number of occupants from six to up to 14 could be expected to result in an increase in noise, mainly associated with additional movement to and from the site.

However, as set out above, the transport statement has concluded that the proposal will result in a negligible increase in person trips and no overall increase in the number of vehicle movements. Also, the occupants will all be employees of Hampton School and will be required to agree to / sign a code of conduct to live in the house. Therefore the proposal is not considered to result in a significant impact in relation to noise.

4.25 The proposal is therefore considered to comply with policy D14 of the London Plan, LP8 of the LBRuT Local Plan and policy 46 of the LBRuT draft Local Plan.

Waste

4.26 Waste and recycling bins are provided within the site and collection of waste will remain unchanged. The proposal is therefore considered to comply with policy LP24 of the LBRuT Local Plan.

Chapter 5

Conclusion

5.1 This Planning Statement supports an application for a change of use of the Old Vicarage, 5 Church Street in Hampton, from Use Class C4 to Sui Generis for use as a HMO for up to 14 people.

5.2 As outlined in this Statement, the proposed development complies with the current planning policy and guidance including that provided by:

- The National Planning Policy Framework (2023);
- The London Borough of Richmond upon Thames Local Plan (2018); and
- The London Plan (2021).

5.3 The proposal also complies with the draft policies set out in the LBRuT draft Local Plan, which is expected to be adopted in winter 2024 / 2025.

5.4 The impact of the proposal will be minimal given the site is currently used as a HMO for up to six people. The change of use will provide accommodation for up to a further eight people in a sustainable location. The principle of development is therefore considered acceptable. The proposal will comply with the Nationally Described Space Standards and will not result in any unacceptable impacts in relation to heritage, transport, access and parking, residential amenity or fire safety.

5.5 In light of the benefits of the proposed development and lack of significant detrimental impacts, we recommend that the proposed development is approved.