



# PLANNING STATEMENT

## 1090 - Marble Hill, 70-72 Richmond Road

December 2024

A BL 3 ARCHITECTS

**A BL 3**  
ARCHITECTS

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# INTRODUCTION

## Marble Hill, 70-72 Richmond Road

This proposal seeks to change use of the first floor ancillary floorspace to the ground floor commercial unit into 1 no self contained flat

### Local Site Context

70 and 72 Richmond Road is an end terrace Edwardian building and adjacent property (one of a pair) located at the corner of Richmond road and Lebanon Park. The building was built in circa 1910 and is not listed, but is within Twickenham Riverside & Queen's road conservation area.

The two buildings are primarily 3 storeys with a 2-storey outrigger to the rear. Marble Hill Fireplaces occupying the ground and lower ground floors spanning both properties.

No. 72 has a self contained 4 bed maisonette flat on its upper floors, and occupies a previously added Mansard on the outrigger.

No. 70 first floor is an ancillary space to the showroom on the ground floor, whilst the second floor and loft conversion house 3 residential 1 bed dwellings.

This building along with 3 storey house on opposite side (The Dentist) acts as an gateway to Lebanon Park, which is a tree lined street leading to the river with lovely Edwardian houses.

The architectural details on this red brick building with slate roof supported at eaves by white stucco brackets above a plain cornice, visually link this building to houses in Lebanon Park. 72 Richmond Park Road has had a mansard added onto the closet wing with a zinc flat roof, as granted in 1982 (ref. 82/0983).

This Planning application seeks prior approval for change of use of the space on the first floor of 70 Richmond Road, which currently serves as ancillary to the showroom on ground floor, to 1 no self contained flat. This application for a change of use does not propose any external changes.

# LOCATION PLAN

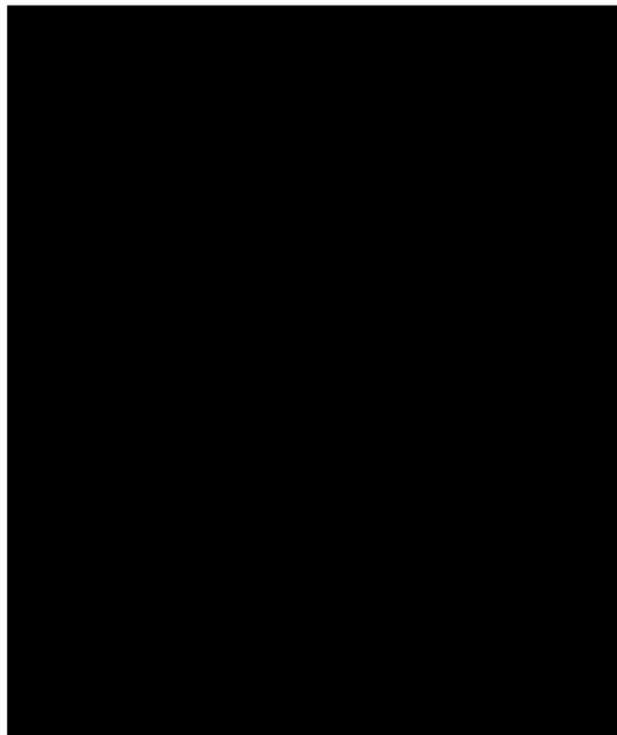


Location Plan

# PHOTOGRAPHS

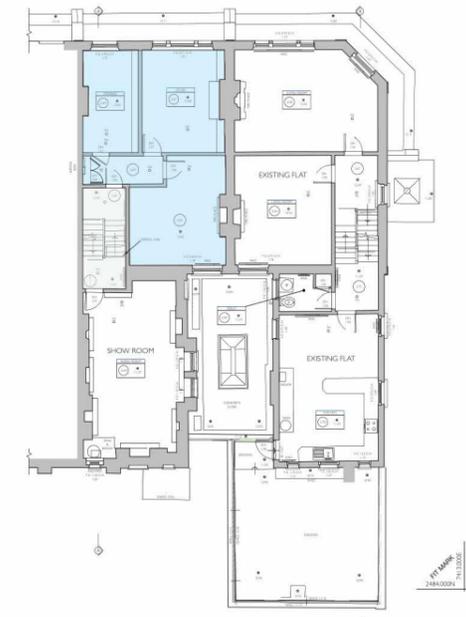


Front Elevation (view from Richmond Road)



Rear Elevation

# PLANS



Existing first floor plan (subject of application in blue)



Proposed first floor plan (subject of application in blue)

# PLANNING STATEMENT

## CLASS MA – COMMERCIAL, BUSINESS and SERVICE USES TO DWELLINGHOUSE

2.1 Class MA confirms Permitted development under this schedule to be:

"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 (dwellinghouses) of Schedule 1 to that Order."

2.2 Schedule 2, Part 3, Class MA.1 confirms that 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;

**This requirement was omitted as of 5th March 2024.**

(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;

**The premises have an established use as a commercial showroom (Class E) on the ground floor and basement level.**

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

**This requirement was omitted as of 5th March 2024. The area involved is less than 1,500sqm in any event.**

(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;

**The site does is not affected by any of these designations.**

(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

(vi) a World Heritage Site;

**The site is not affected by 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;

**The site is not affected by this criterion.**

(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.

**The site is not affected by this criterion.**

Development under Class MA is permitted subject an application to the local planning authority for a determination as to whether the prior approval of the authority will be required in relation to a specific number of matters. These are addressed below.

## CONDITIONS OF CLASS MA

**Transport impacts of the development, particularly to ensure safe site access:**

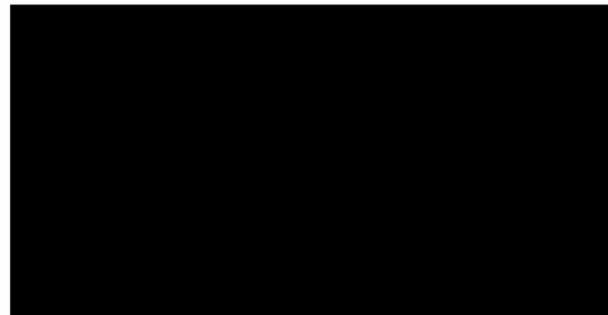
### Vehicle Parking

No additional car parking is proposed as part of the development as per the London Plan which states 'Car-free development should be the starting point for all development proposals in places that are well-connected by public transport. The site has a PTAL rating of 4, thus can be considered 'well-connected'. It is expected that the proposed additional dwellings will not result in a significant change in on-street parking demand.

Regarding disabled vehicular parking, the standards set out in Policy T6.1 of the London Plan state that developments providing 10 or more dwellings should provide off-street disabled parking. This development falls below that threshold, so no off-street disabled spaces are required.

### Cycle Parking

The existing provisions in the rear yard can accommodate 16 cycle parking space in accordance with the minimum standards set out in Table 10.2 of the London Plan (2021) and London Cycle Design Standards.



## Servicing and Refuse Collection

The proposal has a dedicated space for refuse and recycling located off-street, the bins can be easily accessed from Lebanon Park for servicing. As the site is located within a high-density residential area, it is likely that many such delivery vehicles will already be serving several neighbouring properties/areas, and therefore would not be new to the local network. Emergency service vehicles can also service the site from the highway if needed.

## Construction Traffic

This application relates to a change of use and only modest internal works are proposed. It is not anticipated that this will involve the removal of any spoil or large quantities of waste materials. Any materials associated with the works to convert the premises to residential use would be stored within the building for health and safety reasons as well as security. The works would not generate a material increase in vehicles using the local road network nor infringe on the safety of any road user, including pedestrians.

The proposal would comply with Policy LP45 and the NPPF.

## Contamination risks in relation to the building

The building has been used for general commercial purposes and there are no known contamination issues associated with the building or previous uses.

No contamination risks are identified.

## Flooding risks in relation to the building

The site is located

- in Flood Zone 1,
- not within a Critical Drainage Area
- not in an area susceptible to groundwater flooding

and as such, the development would not increase the risk of flooding.

## PLANNING STATEMENT CNTD.

Impacts of noise from commercial premises on the intended occupiers of the development

The building is bounded by other mixed use buildings that typically comprise Class E at ground floor level (in full or part) and Class C3 residential use above. The proposal residential use is entirely compatible with existing Class E and Class C uses adjacent to it. There are no notable sources of noise in the vicinity, with the flat located on the first floor of the building fronting Richmond Road.

Accordingly, due to the nature of the proposed and the surrounding uses, the development is considered to neither result in any noise impacts that would affect neighbouring uses nor be adversely affected by noise to the detriment of intended occupiers of the development.

Impact on the character or sustainability of the conservation area

The site is located within a conservation area however the development doesn't involve a change of use of the whole or part of the ground floor, thus the impact of that change of use on the character or sustainability of the conservation area is not necessary. Additionally the submission does not involve external changes. The frontage of the premises along Richmond Road would remain as existing, no change or impact on the established character of the conservation area would thus arise in this regard.

The area is of mixed use, including commercial and residential. In this regard, the proposal would not have a detrimental impact on the mix of uses within the conservation area. The proposal would not compromise the sustainability of the conservation area and would bring part of the building back into an economic and viable use. This would positively contribute to the sustainability of the conservation area and ensure the long-term management and maintenance of the premises.

The provision of adequate natural light in all habitable rooms of the dwellings

All habitable rooms would be served by windows that provide both good light and ventilation. All the details are shown on the accompanying drawings.

The impact on intended occupiers of the development of the introduction of residential use in an area the authority considers to be important for general or heavy industry, waste management, storage and distribution, or a mix of such uses

The site is not within an area the Council considers important for general or heavy industry, waste management, storage or distribution. As noted previously, the immediate area along this part of Richmond Road is predominantly Class E with residential above.

The loss of services provided by a registered nursery, or a health centre maintained under section 2 or 3 of the National Health Service Act 2006

The change of use does not involve the loss of a registered nursery or health care centre.

Where the development meets the fire risk condition, the fire safety impacts on the intended occupants of the building

The site does not meet the fire risk condition as it is not 18 or more metres in height, it does not contain 7 or more storeys and a single flat is proposed.

In compliance with paragraph W (prior approval), it is confirmed the proposed development would be completed within a period of 3 years from the prior approval date.

It is further confirmed that the proposed development would be intended to be exclusively used as a C3 dwellinghouse, with no intended usage outside of this.

This proposal seeks to change use of part of the first floor ancillary floorspace to the ground floor commercial unit into 1 no self contained flat.

The proposal does not result in loss of the commercial retail unit, the loss of ancillary space to the commercial unit is 47m<sup>2</sup> (out of total of 152m<sup>2</sup> - loss of 31% of the total ancillary space to the retail unit).

## PRE-APP ADVICE

Pre-Application Advice

Pre-application given on 8th October 2024 (ref 24/P0146/ PREAPP) that is relevant to this application:

*"Policy LP34 sets out that the borough's target is 3,150 homes for the period 2015-2025, with 000-1050 proposed for Twickenham. [...] Policy LP35 sets out that development should generally provide family sized accommodation, except within the 5 main centres where a higher proportion of small units would be appropriate. As the application site is located within a main centre buffer zone, smaller 1 bedroom units are considered acceptable."*

*"Local Plan policy LP26 E is particularly relevant as the proposal site is not located in designated shopping frontage, nor is it serving a local need (where Policy LP27 would apply) as it is within 400m of designated frontage, being in proximity to the key shopping frontage on Church Street and York Street in Twickenham Main Centre. There is no requirement to protect retail per se in such locations. Instead, LP 26 E states that the Council will consider favourably applications for changes of use to any non-A1 use which is a commercial or community use compatible with the retail function of the centre and this is elaborated upon in the supporting text."*

*Paragraph 7.2.14 states that in these locations, where the proposal results in the loss of commercial or community floorspace (including ancillary space) to other uses, the ground floor unit should remain a viable size and there should be no unacceptable loss of commercial or community space on upper floors."*

*In this instance it is noted that the proposal does not result in a complete loss of the retail unit as the frontage would remain. 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."*

*"The proposals would not result in the complete loss of a commercial floorspace, and it appears a reasonably sized commercial unit would be retained subject to clarification."*

*Within a full application, the existing/proposed floorspace figures should be confirmed and it should be made clear that the existing office space is ancillary to the retail use (and therefore LP41/emerging Policy 23 would not apply)."*

# DIAGRAM: FIRST FLOOR EXISTING AND PROPOSED

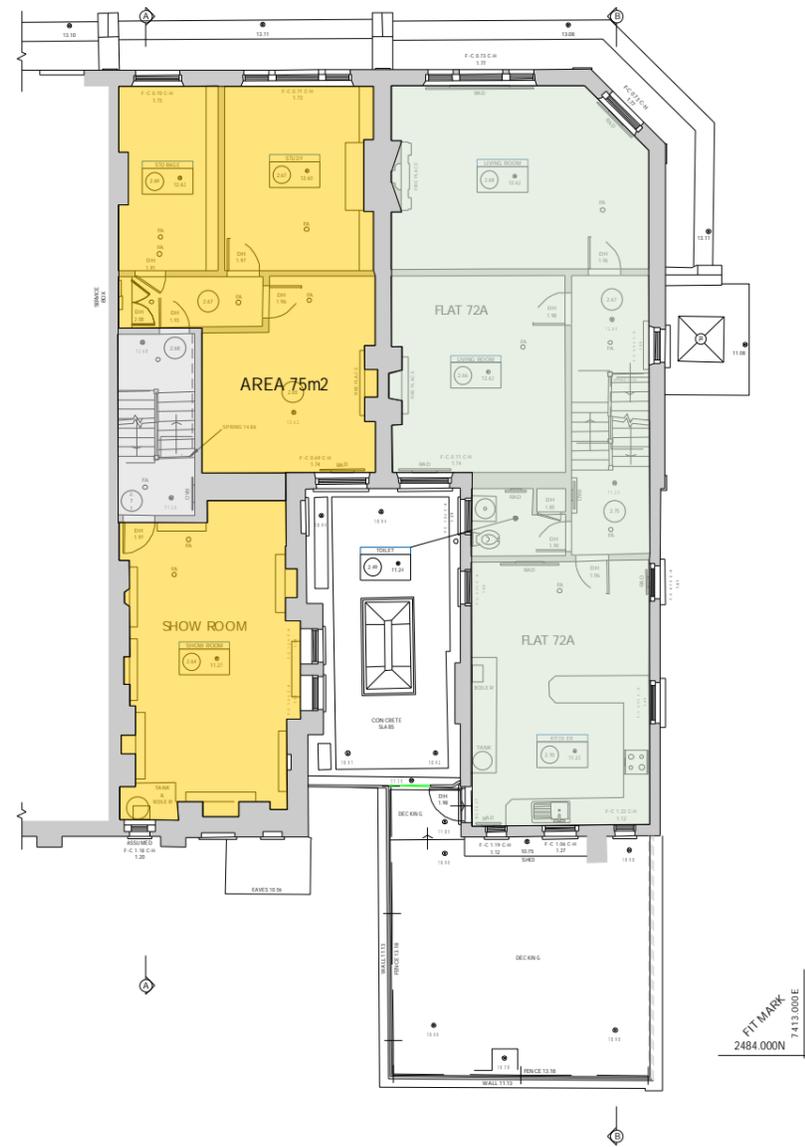


Diagram of existing first floor layout.

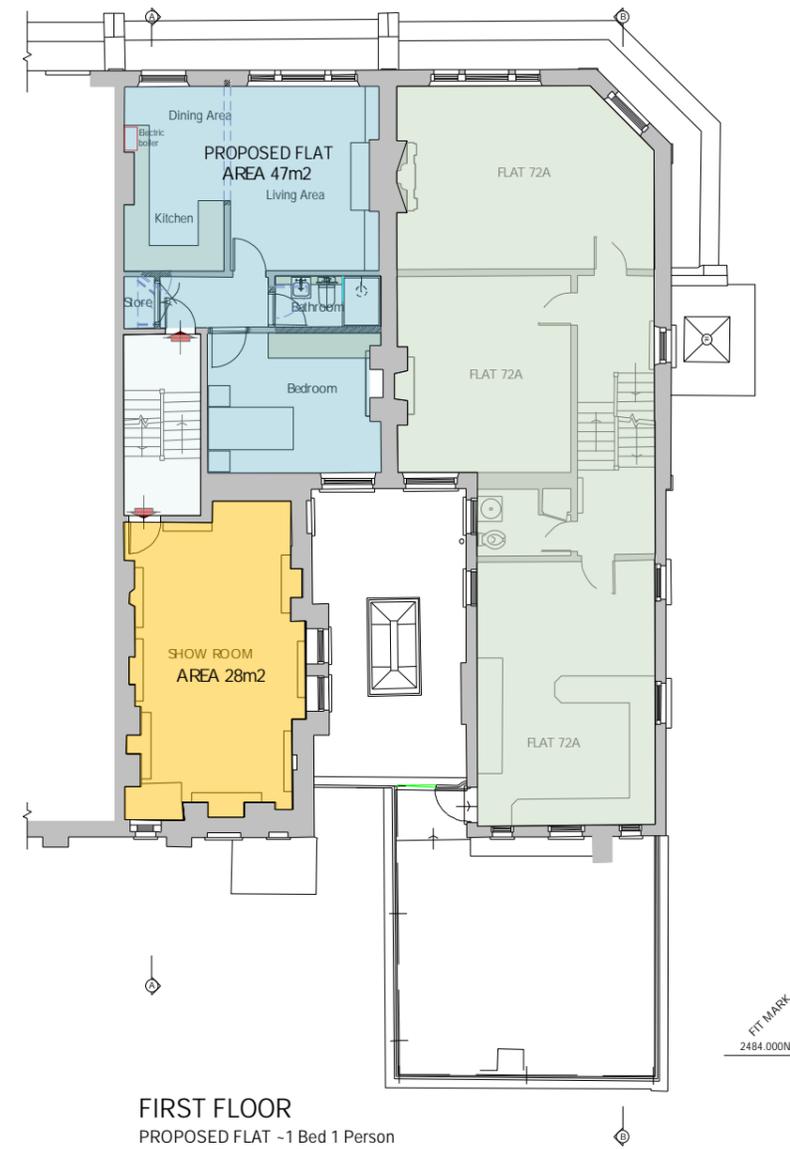


Diagram of proposed first floor layout.

- Application Site Ancillary Retail
- Residential Unit
- Proposed residential unit

# LOCAL CONTEXT

Analysis of planning history of the terrace shows that, as existing, several of the buildings have residential units to the rear and residential units occupying the upper floors.

Application ref. 02/2034 shows that the residential units of No.60-64 Richmond Road occupy the rear of the ground floor and basement level.

The existing retail units of the terrace occupy only the ground floor space as indicated on the diagram.

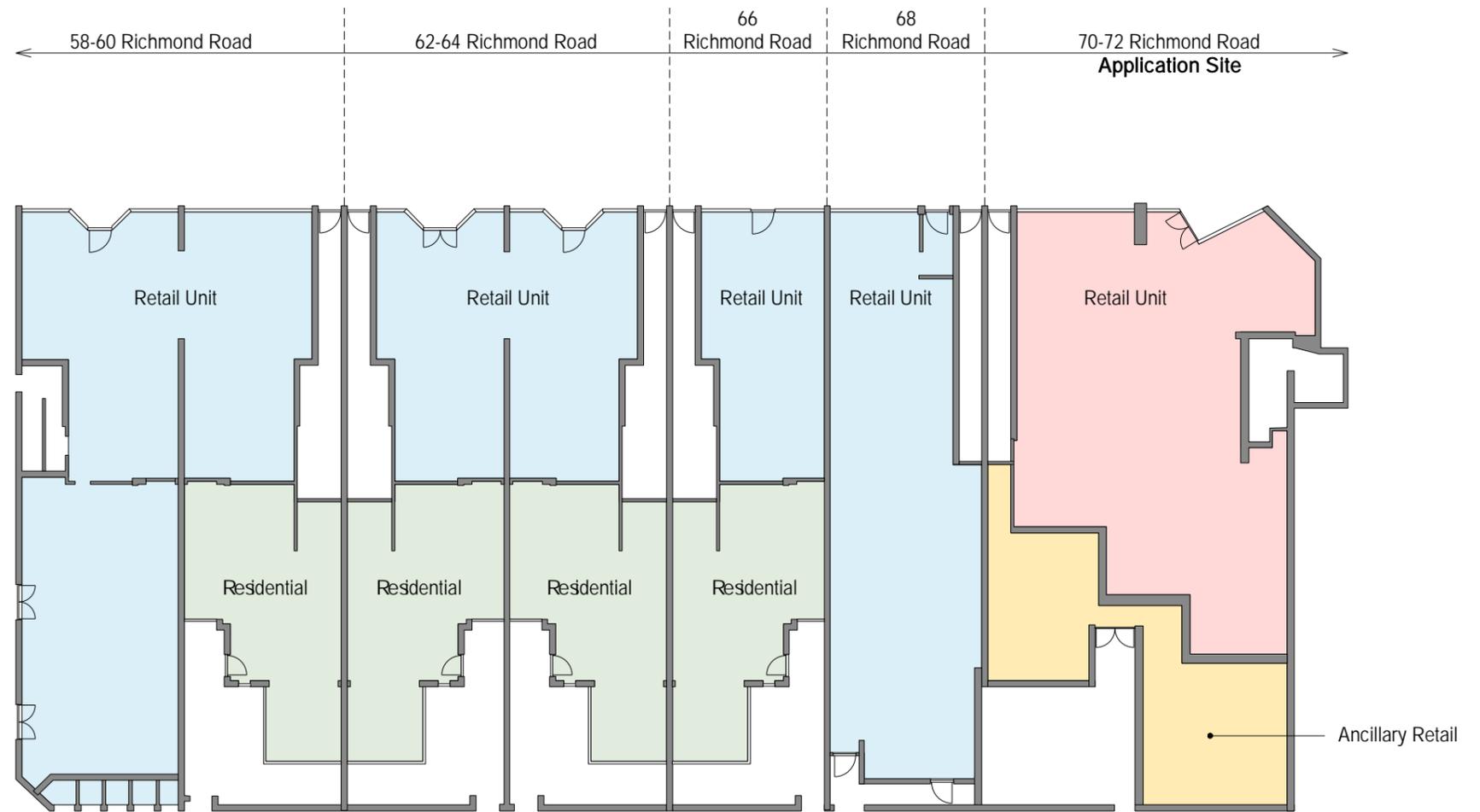


Diagram is indicative of the existing layout, do not scale from this drawing.

- Retail Unit - Ground Floor Only
- Application Site Ancillary Retail
- Residential Unit
- Application Site Retail Unit

# RETAIL SPACE AND IT'S ANCILLARY SPACE

The retail unit at the application site currently occupies the basement, ground floor and part of the first floor. The first floor is not the main retail space, it is used for ancillary purposes, as such the loss of the space at first floor level of the application site is not thought to be detrimental to the retail unit as it would maintain a viable size.

The proposal does not result in loss of the commercial retail unit, the loss of ancillary space is 47m<sup>2</sup> (out of total of 152m<sup>2</sup> - loss of 31% of the total ancillary space to the retail unit).

Diagram of Basement plan

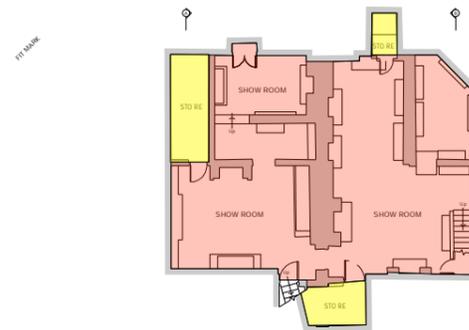


Diagram of Ground floor plan

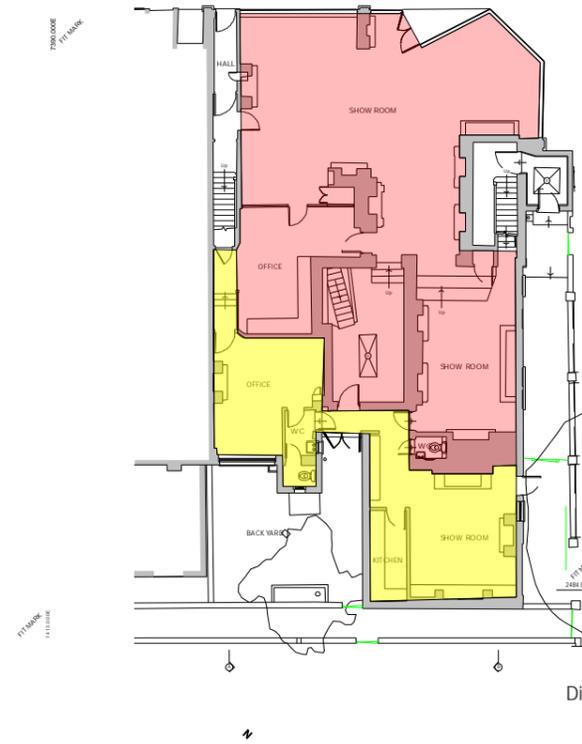


Diagram of First floor plan



Diagram is indicative of the existing layout, do not scale from this drawing.

- Application Site Retail Unit
- Application Site Ancillary Retail