
**Environment Directorate
PLANNING**

Civic Centre
44 York Street
Twickenham
TW1 3BZ
website: www.richmond.gov.uk

Our ref: 23/P0032/PREAPP

Contact: Jack Davies
Telephone: 0208 891 1411
Email: jack.davies@richmondandwandsworth.gov.uk

Nadeeka Sivananthan
info@na-architects.co.uk

21 April 2023

BY EMAIL ONLY

Dear Nadeeka,

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)

Site: First Floor Saint Andrews House Upper Ham Road Ham Richmond TW10 5LA

Proposal: Change of use of existing first floor office space into 2x self contained flats by extending the rear of the building. Conversion of roof into a self contained flat by adding dormers & raising the roof slightly.

I write in reference to your request for pre-application advice following the pre-application meeting held on Thursday 16 March 2023. This advice also follows revised drawings which were submitted and reviewed by the Councils Conservation and Planning Officers.

Introduction and proposal

Saint Andrews House is a two storey detached, hipped roof building which directly addresses the pavement edge of Upper Ham Road. The building is situated within the Ham Common Conservation Area which encompasses the distinctive historic settlement which sits around the triangular green section of Ham Common. As set out in the CA Statement, "Buildings around the green are varied in scale, from groups of modest terraced cottages to 18th century mansions in their own mature grounds". This variety is particularly prevalent on the east side of the Green where there is range of building types and ages, reflecting the gradual development of sites addressing the common. The variety adds visual interest to the street scene however there is an overall consistency of height and form with most buildings being two storeys with hipped or pitched roofs.

Proposals seek to change the use of the upper floor from office to residential and raise the roof of the building in height to allow additional accommodation at this level. Large dormers are proposed to the front, rear and sides of the building as is a first floor rear extension.

Relevant Planning History

13/3846/P3JPA - Change of use to St Andrews House from current use as offices B1 to a residential dwelling house C3. **Prior Approval Refused**

Policies

The proposal has been considered having regard to the NPPF and the policies within the Council's Local Plan, in particular:

- LP1 Local Character and Design Quality
- LP3 Designated Heritage Assets
- LP4 Non-Designated Heritage Assets
- LP5 Views and Vistas
- LP8 Amenity and Living Conditions
- LP21 Flood Risk and Sustainable Drainage
- LP22 Sustainable Design and Construction
- LP24 Waste Management
- LP34 New Housing
- LP35 Housing Mix and Standards
- LP36 Affordable Housing
- LP40 Employment and local economy
- LP41 Offices
- LP44 Sustainable Travel Choices
- LP45 Parking Standards and Servicing

Supplementary Planning Documents/Guidance:

- Affordable Housing
- Design Quality
- Refuse and Recycling Storage Requirements
- Residential Development Standards
- Transport

All Local Plan policies and Supplementary Planning Guidance and Documents referred to in this letter are available to view on the Council's website (www.richmond.gov.uk).

The Local Plan is in the process of review and it is anticipated that the Reg 19 Local Plan will shortly be published for consultation. At that stage, it is anticipated that it will be a material planning consideration for the assessment of applications and you are therefore advised to review the content of the relevant policies at that stage.

Principle of Development

- The proposals are for change of use of the first floor office space to residential.
- Policy LP 41 includes a presumption against the loss of office floorspace in all parts of the borough.
- Outside the Key Office Areas, any loss of office floorspace will only be permitted where evidence is provided that demonstrates that there is no longer demand for an office-based use in this location and that there is not likely to be in the foreseeable future.
- This must include evidence of completion of a full and proper marketing exercise of the site at realistic prices both for the existing office use or an alternative office-based use completed

over a minimum period of two continuous years in accordance with the approach set out in Appendix 5 of the Local Plan.

- Following this, a sequential approach to the redevelopment or change of use is applied that prioritises alternative employment uses including social or community infrastructure uses, followed by maximum provision of affordable housing.
- It was discussed at the meeting that the office floor space has been vacant and that marketing has been undertaken, although this has not been submitted to the council for review and therefore the council cannot comment on the acceptability of such.
- In the absence of adequate marketing information the council would object to any change of use from office floor space.

Design

- Policy LP1 of the Local Plan requires all development to be of high architectural and urban design quality and compatible with local character in terms of development patterns, scale, height and design.
- From historic maps, it appears that a building on the pre-app site, in the same footprint existed since at least the 1860s with the building being identified as 'Works' in the 1930s. It is likely that the building is Victorian but altered to the front elevation. Regardless, the building makes a positive contribution to the conservation area, being in keeping with the general height and scale of the surroundings and maintaining some historic features. The set forward positioning of the building in the street scene does serve to ascertain the building's presence, making it more prominent than the BTM to the south.
- As set out above, the building's positioning in street scene, make it particularly prominent in this part of the CA. As such, any increase in height of the roof would serve to increase this prominence particularly of the extent proposed in this pre-app. The Increase will be significant and will result in the building no longer appearing balanced but instead top-heavy.
- The proposed dormers are also excessive in size and form and would appear overly incongruous and out of place in this context. They would also serve to increase the prominence of the roofscape of the building, due to their size and scale. The front dormer would also mask the chimney stack which forms a positive feature of the skyline and would cover most of the front roof slope.
- The simple hipped roof form of the building seeks to reduce the building's visual prominence and proposals would be contrary to this. The proposed increase in height as well as the dormers would result in the building also towering over its BTM neighbour, harming its setting.
- In addition to the increase in height of the building, it is also proposed to increase the depth of the building to the rear by a significant amount. Whilst this increase in depth would make a lesser impact on the Conservation Area, it would seek to increase the overall scale of the building to the extent that it would appear too dominant. The proposed extensions would fail to be subordinate to the original building and therefore from a design point of view, would fail to maintain its character, contrary to LP1 and LP3 of the Local Plan.
- Amendments were received which omitted side and front dormers and also reduced the extent of the raised roof ridge. It is not considered that the revised drawings address the concerns outlined above regarding the scale and form of the rear extension and replacement roof. The raising of the roof ridge will alter the original roof form and it is considered that the roof would appear out of scale with the original property.
- The proposed rear dormer is set in from the sides, down from the ridge and up from the eaves. The size and scale of this is appropriate, however if a dormer is sought it would need to be constructed without raising the roof ridge.
- There is also an objection to removal of the front chimney stack, which is located in a prominent position and is an interesting feature of the application property.

Residential Amenity

- Policy LP8 requires all development to protect the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties. This includes ensuring adequate light is achieved, preserving privacy and ensuring proposals are not visually intrusive.
- Notwithstanding the above objections, it is noted that the neighbouring property at St. Andrews Place has side facing upper and ground floor windows. It would appear from historic planning applications that the upper floor windows benefit bathrooms, and the lower floor windows a dual aspect living space and a stairwell. Given such it is not considered the proposals would appear overbearing and nor would they result in loss of light which would warrant a reason for refusal.
- Had the side facing dormers been acceptable a condition could have been added which requires obscure glazed glass to avoid overlooking.

Housing Mix and Standards

- LP35 states that 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.
- Given the site is located outside a town centre location, family dwellings are preferred. 3 x 1 bed units were proposed originally and 2 x 1 bed units proposed in the amended set of drawings. It would be required that any future application justify why family accommodation is not achievable.
- All new units should comply with the requirements set out in the Nationally Described Space Standards.
- Your attention is also drawn to the need to achieve a minimum floor to ceiling height of 2.5m for at least 75 per cent of the Gross Internal Area of each dwelling as required by the London Plan.
- The revised submission appears to show a bathroom within the roof space. The bathroom does not appear to be connected to either of the proposed residential units on the first floor.

Affordable Housing

- Policy LP36 requires contributions to affordable housing from all small sites, further details are set out in the Affordable Housing SPD.
- Where a reduction to an affordable housing contribution is sought on economic viability grounds, developers should provide a development appraisal to demonstrate the viability of the scheme.
- The developer will be required to underwrite the costs of a Council commissioned economic viability assessment.
- Given the proposal results in loss of office floorspace, in accordance with Policy LP41, affordable housing provision should be maximised.

Sustainability

- Policy LP22 requires developments to achieve the highest standards of sustainable design and construction in order to mitigate against climate change.
- Any future application would need to include a completed Sustainable Construction Checklist and a statement to demonstrate that the new units would achieve maximum water consumption of 110 litres per person per day.
- Proposals for change of use to residential will be required to meet BREEAM Domestic Refurbishment 'Excellent' standard (where feasible).

- If units are proposed which do not form part of the 'conversion', an Energy Report will need to be submitted to demonstrate compliance, achieving 35% reduction in carbon dioxide emissions. This should be measured against the 2021 Building Regulations baseline.

Parking Standards and Servicing

- The applicant proposes to have one off-street parking space. The site has a PTAL of 1B and is not in a Controlled Parking Zone. It is car free development.
- For the 3x1-bedroom dwellings the applicant would need to provide up to Three off-street parking spaces to meet the maximum off-street vehicular parking standards set out in Appendix 3 of the Local Plan and 4.5 spaces to meet the maximum off-street vehicular parking standards set out in chapter 10 of the London Plan (2021).
- As the proposal is to be car free the applicant needs to submit an on-street vehicular parking stress survey which must show that the removal of three spaces would not take on-street vehicular parking stress beyond 85% of on-street parking capacity. The survey must be completed in accordance with Richmond Parking Survey Methodology.
- The applicant needs to provide one secure cycle parking per studio in accordance with the London Plan (2021). These need to be designed and built-in accordance with guidance set out in the London Cycle Design Standards.
- A development of 3 x 1 bed flats must be provided with suitable and sufficient space to store 1 x 360L refuse bin, 1 x 240L paper/card recycling bin, 1 x 240L mixed containers recycling bin, 1 x 140L food waste bin.
- Residential and commercial waste storage should be separated.
- In order to demonstrate the development may be carried out in a safe manner, the applicant must submit a detailed Construction Traffic Management Plan for the project, demonstrating how the works are to be carried out, including but not limited to: The number and type of vehicles that will be required, routing, methods of spoil removal and concrete supply, protection for other highway users and vulnerable pedestrians, the position of vehicles, skips, etc. Site setup drawings at a minimum scale of 1:200 are required showing the site in context of the surroundings.

Fire Strategy

- London Plan policy D12 requires all development proposals to achieve the highest standards of fire safety.
- Any future applications must be accompanied by a statement as to how the proposed development addresses the requirements of the policy. This should include showing on plan that space has been identified for positioning of fire appliances and evacuation assembly points.

Conclusion

- There is a presumption against the loss of office floor space, any future application will need to be accompanied by robust evidence of a marketing exercise carried out in accordance of Appendix 5.
- It is considered that the proposed extensions will result in an overly dominant and incongruous form of development that would significantly enlarge and alter the original form and character of the building, resulting in an overly bulky roofscape that would make the building appear top heavy. The building would appear overly prominent in views from the conservation area and in the setting of the BTM to the south. The roof dormers as originally proposed are also too large and incongruous and exacerbate the overall bulk of the roof alterations. The council would not support the principle raising the roof of the building or introducing front dormers.

Submission Documents

As well as those documents listed in this letter, you are advised to review the Local Validation Checklist to ascertain the drawings/reports/documents associated with the development will need to be submitted with any future application.

https://www.richmond.gov.uk/media/18491/local_validation_checklist_for_all_applications.pdf

Without prejudice

Any given advice by Council Officers from pre-application enquiries does not constitute a formal response or decision of the Council with regard to future planning consents. Any views or opinions expressed are given in good faith and to the best of ability without prejudice to formal consideration of any planning application, which was subject to public consultation and ultimately decided by the Council. You should therefore be aware that officers cannot give guarantees about the final form or decision that will be made on your planning or related applications.

Although the advice note will be brought to the attention of the Planning Committee or an officer acting under delegated powers, it cannot be guaranteed that it will be followed in the determination of future related planning applications and in any event circumstance may change or come to light that could alter the position. It should be noted that if there has been a material change in circumstances or new information has come to light after the date of the advice being issued then less weight may be given to the content of the Council's pre-application advice of schemes. You are also advised to refer to local and national validation checklist on the Council's website.

Yours sincerely



Nicki Dale

Team Manager – South Area
Development Management
London Borough of Richmond Upon Thames