

09/0703/COU
66 Crown Road
Twickenham

Site, history and proposal

The site is occupied by a two storey end of terrace building with accommodation in the roof and sited on the corner of Crown Road and Napoleon Road. The building is not listed or in a conservation area.

The site is within the St Margarets CPZ.

The property is vacant but was previously in use as a doctor's surgery.

79/1269 – Change of use from house to doctor's surgery and self contained flat granted.

80/05788 – permission granted to convert the entire property to a doctor's surgery.

07/4239/FUL – Change of use of vacant doctor's surgery into two 2-bedroom flats, one 1-bedroom and 1 studio flat with a single storey rear extension and external alterations was refused for the following reason (committee decision):

The proposed development by reason of the number of dwellings, inadequate cycle parking provision, siting and scale of extension works and absence of a unilateral undertaking to restrict the issuing of parking permits would represent an overintensification of use with a detrimental impact on local parking conditions, the amenities of occupants of neighbouring residential properties and the area in general. The proposal is therefore contrary to Policies HSG 11, BLT 11, 13, BLT 16 and TRN 4 of the London Borough of Richmond upon Thames Unitary Development Plan: First Review 2005 and the Council's Supplementary Planning Guidance for House Extensions and External Alterations.

The proposal is a change of use from a (vacant) doctor's surgery to a house of multiple occupancy. Eight bedrooms are proposed that would be set over three floors with 2 bathrooms a shower room and a communal lounge and kitchen.

Public and other representations

Thames Water – no objections.

Cllr Morgan has objected on the grounds that the proposal would be out of character for the area, noise pollution, waste disposal and recycling the already stretched car parking in the area.

48 Letters received objecting on the following grounds:

- Parking pressure/nothing to stop tenants requesting permits
- Danger of traffic to children who play in the quieter streets
- Use of doctors bay
- No plans showing recyclable waste
- No provision for cycles or motorcycles.
- Inappropriate use
- Unacceptable increase in density
- No windows to some bedrooms

- Type of accommodation and tenants could have a deleterious impact on the area and proximity to Orleans Infant School.
- Noise and disturbance
- Previous decisions
- No cycle parking or refuse storage
- Strain on facilities and infrastructure in the borough
- Loss of surgery
- Overdevelopment/over intensification/overcrowded and out of character
- Installation of vents
- Non planning matters raised (contravenes building, fire and safety regulations).

Professional comments

It was held on the previous application that the conversion from a doctors' surgery to a residential use was acceptable and there has been no material change in circumstance to contest the principle of conversion.

It is also worth noting that the two applications granting permission for the doctor's surgery included a condition that the premises be used only as a part doctors' surgery and part flat or as a single family dwelling.

Suitability for conversion and impact on residential amenity

Policy HSG15 states that the Council will consider favourably applications for new non self-contained accommodation provided that the proposals comply with policies HSG 13 and HSG 14(A). This is on the basis that such accommodation would provide a valued source of cheaper accommodation for young and transient groups in the population who have not reached a stage where they can buy, for people who are unable to gain access to other forms of housing and for people who would otherwise be homeless.

With due respect to the objections received, there is no evidence to suggest that the units would (in the event of an approval) be let out as a hostel or accommodation for ex-offenders etc. Even so there is no planning legislation to restrict the occupation of units by certain groups as this would be discriminatory.

Policies HSG 13 and 14(A) requires that the subdivision into smaller units satisfactorily relates to the environment, will not unduly affect the amenities of adjoining premises and a reasonable standard of accommodation is achieved.

The criteria for assessing such an application are set out below:

- number of units in relation to size of property;
- the size and layout of the property and its physical characteristics, in relation to this and adjoining properties;
- mix of unit sizes, and particularly the need to increase the supply of small low cost units for rent and owner-occupation;
- level of day lighting and sunlight and avoidance of overlooking;
- access to private garden space;
- environmental standards including refuse storage;
- on-street parking conditions and on-street parking restrictions; the adequacy of public transport and on-site parking proposed;

- The location of the property and the need to protect the established character of existing residential areas;
- The effect on the amenities of adjoining premises.

A site visit to the property reveals that bedroom 5 does not have any windows and is served by an obscure glazed roof. Whilst this allows the room to be well lit and possibly ventilated, it provides a meek outlook. The window to bedroom 2 is at a high level and again whilst this provides light and ventilation it provides a poor outlook for future occupants.

The occupants of these rooms would have access to the communal living area and garden however the former is relatively small considering it would serve 8 rooms and is only lit via a small obscure glazed block window facing Napoleon Road and through borrowed light from the glazed kitchen roof and hall way roof lights. The garden is relatively small, much of which would be occupied by refuse and cycle stores. It is however noted that the site is within walking distance to Marble Hill Park.

As such the proposal would not provide a suitable level of accommodation for future occupants, particularly to bedroom 2 and 5.

The plans submitted do not appear to be to an accurate scale however using the plans from the former application, it would appear that some of the rooms are less than 10sqm in area and thus considered unsuitable for occupation, particularly room 5 and 6. Many of the other rooms appear from the site visit to be reasonable in size to accommodate a double bed, kitchenette and wardrobes etc.

Environmental Health officers have objected on the grounds that there is only one kitchen. Their HMO standards require no more than 5 people to share one kitchen. The kitchen is relatively small and it is not envisaged that more than 2 people could use this at once and whilst the washing machine and drier are to be sited under the stairs it is still considered that this would be particularly cramped. The applicant has stated that the rooms would be let on a sole occupancy although it was mentioned that some of the larger rooms could accommodate couples. Therefore having at least 8 people relying on one kitchen is not reasonable.

Environmental Health officers also raise concerns regarding the size of the bathrooms but a site inspection of these reveals that they are a suitable.

The proposal would thus be contrary to policy HSG14, the design failing to provide a satisfactory standard of accommodation thereby resulting in unsuitable living arrangements for future occupants by reason of the cramped layout, small nature of some of the bedrooms and relatively small communal areas (living room, kitchen and garden) and poor outlook.

It is not considered that the conversion of the building into a HMO would alter its external appearance or character when viewed from the street scene. There is a range of housing types in the area from medium to large family housing to maisonettes and flatted development on Crown Road and the property is sited between two Areas of Mixed Use. As such it is not considered that the proposal is inappropriate or out of character.

The previous application for 4 flats cited the over intensification of the use as causing a harm to neighbour amenity in terms of noise and disturbance. It is noted that a number of the bedrooms would adjoin the party wall with no. 68 Crown Road and alongside the general activity including the comings and goings of occupants

(including the use of the refuse and cycles stores) it is considered that the proposal would amount to an unreasonable level of noise and disturbance.

Refuse and cycle storage would be located to the rear garden, however transport planners consider that the cycle store is not large enough to accommodate eight bikes. In the event of an approval such matters are dealt with by way of a condition however it is difficult to envisage a cycle store for some eight bicycles and refuse storage facility for at least eight occupants in this area without compromising the outlook from bedroom 6 or eroding the little outdoor space that occupants would otherwise have and/or harming the visual amenities of the street scene.

The rear garden is sunken below street level and the applicant has provided very little detail in terms of access and egress of bicycles and the communal refuse bin on collection days.

As such the proposal fails to address the refuse storage criteria set out in HSG 14 and thereby emphasising the over intensification that the proposal would result in.

Parking and traffic matters

As mentioned above, the site is within a controlled parking zone and whilst the applicant has stated that he would agree to a condition requiring parking permits to be restricted through a legal agreement (this would render all future occupants ineligible for such permits), given the hours of the CPZ (Monday-Friday 10am-4.30pm) there would be no restriction on occupants parking in the morning and late afternoon onwards in the surrounding streets i.e. before and after working hours when residential parking would begin to increase to its late evening and overnight peak.

The doctors' on street parking bays would be reverted back to the CPZ, however this would still result in the CPZ being over subscribed and little comfort to residents where a number of vehicles associated with occupants would lead to parking pressures on the local highway.

As mentioned above, the authorised use of the property is a surgery with/without a self contained flat. A comparison on parking standards between the authorised use and that proposed would not be relevant because the lack of residential parking permits would restrict day time parking and the surgery is unlikely to have been operating into the evening when residential parking pressure is at its peak. The only on street parking taking place would have been on the separate doctor's parking bay and a space used (if any) by the occupant of the flat who may well be the doctor.

As such the proposal is considered to have more impact on local parking conditions outside of the CPZ than the former use as a surgery.

Given that an overspill of 4 vehicles (maximum) was not accepted on the previous application, an application for 8 units, albeit as part of a HMO would be difficult to justify on parking grounds. A number of on street parking spaces were available on Napoleon Road just before 10am however a number of these spaces would have been occupied by commuters earlier that morning. No evidence has been submitted to demonstrate that there are available spaces in the surrounding area to absorb an overspill from the application site.

Given the nature of Crown Road and the volume of traffic in the area, it is not envisaged that the proposal would result in unreasonable traffic congestion.

Other matters

The site would have a density of 249 habitable rooms per hectare and compliant with the London Plan density matrix which sets out that 150-250 habitable rooms per hectare for a site such as this with a PTAL of 3 (medium).

The units per hectare is expected to be high given the number of rooms and relatively small nature of the site and whilst a high density in itself is not a reason for refusal harm has been identified in relation to the suitability of the rooms and parking pressure.

Conclusion

The proposed conversion of the surgery into a HMO would result in a cramped and unsuitable form of accommodation for future occupants with little room to accommodate cycle and refuse storage. The increase in occupants on the site notwithstanding the restrictions on parking permits though a legal agreement would result in a detrimental impact on local parking conditions and the amenities enjoyed by the occupants of adjacent residential properties.

Recommendation

Refuse.