

PLANNING STATEMENT

In respect of

SANDYCOMBE CENTRE
1-9 SANDYCOMBE ROAD,
RICHMOND
TW9 2EP

On behalf of

Goldcrest

RPS CgMs Ref: KG//19794

December 2016

QUALITY MANAGEMENT

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1 INTRODUCTION

1.1 Goldcrest is proposing the redevelopment of a site that is located immediately to the north of the junction of Sandycombe Road, Lower Mortlake Road, Lower Richmond Road and Manor Road. The site is in close proximity to the Sainsbury's Superstore and approximately 350m to the north of North Sheen National Railway station. The site is entirely within the London Borough of Richmond-Upon-Thames.

1.2 Planning permission is sought for the following:

"Redevelopment of the site to provide for a mixed-use development comprising 535 m² of commercial space and 20 residential units, together with car parking and landscaping"

1.3 This application is a re-submission of an earlier refused application with external changes to address the refusal reasons. This Planning Statement sets out the key planning policy considerations and guidance against which the viability and impacts of this scheme are to be assessed.

1.4 A number of other documents have been submitted in support of the planning application. The submission documents are referred to as and when necessary throughout this Statement.

2 SITE AND SURROUNDING AREA

- 2.1 The following provides an overview of the Site, together with its immediate and wider context. Further detail of the character of the site and its context is provided in the Design and Access Statement, which has been submitted as part of the planning application.

The Site

- 2.2 The site is located on the eastern side of Sandycombe Road, close to its junction with Lower Richmond Road. The site is wedge shaped, running broadly north to south and is at its widest to the north before tapering to almost a point to the south. It has an area of approximately 0.147 ha.
- 2.3 The site is bounded to the west by Sandycombe Road, beyond which are two storey dwellings. To the south of the site is a roundabout where Sandycombe Road, Lower Richmond Road, Lower Mortlake Road and Manor Road meet. This roundabout is elevated above the ground level of the site. The site is bounded to the east by a railway line which accommodates both underground and overground trains between Richmond and Kew and onwards to central and north London. To the north is no 11 Sandycombe Road which has an extant permission for redevelopment and more recently permission has been granted for the demolition of the buildings.
- 2.4 The site is occupied by a modular metal-clad warehouse built in the 1980's with a hard standing wrapping around its northern, western and southern elevations. The warehouse is sub-divided into five units. The existing building is of poor quality and is in need of repair or refurbishment or preferably redevelopment to provide better quality and more sustainable modern employment floorspace.
- 2.5 The site is not within a Conservation Area. The boundary of the Kew Gardens Conservation Area is located approximately 230m to the north west of the site.
- 2.6 There are no Listed Buildings or protected trees within the site or in the vicinity of the site.

Surrounding Area

- 2.7 The area surrounding the site is mostly residential in nature and comprised of taller buildings. The areas to the north, east and west of the site are characterised by two-storey and two and a half storey residential development. Lower Richmond Road and Lower Mortlake Road comprise a mix of residential units and taller commercial buildings. To the south of these roads there are a number of larger retail and commercial units and mixed use developments.
- 2.8 The Victorian and interwar residential terraces in the surrounding area have been constructed predominantly with London brick. Most of them have been painted or rendered with a range of pale colours at different stages.
- 2.9 The Public Transport Accessibility Level of the site is 4 (Good). The 391 bus route stops and passes in front of the site and connects the site with Richmond Bus Station and Sand's End Sainsbury's. Bus stops within a 200m radius connect the area with Richmond, Kingston Hounslow and Central London. North Sheen National Rail station is approximately 350m to the south east of the site.

3 PLANNING HISTORY

3.1 The planning history of the site prior to the applicant's acquisition of the site and relevant adjoining land is set out below.

1-9 Sandycombe Road (Sandycombe Centre) (Excluding discharge of conditions applications)		
LPA Ref.	Proposal	Decision
1-9 Sandycombe Road		
89/0988/ADV	Installation Of 1x96 Sheet And 3x48 Sheet Advertisement Hoardings	Permission Refused (23/06/1989)
85/1536/ADV	Display of non-illuminated free standing sign. (Amended Plan No 459/SK 17 B received on 14.11.85).	Permission Granted (28/01/1986)
85/1062	Retention of building comprising five units for light industrial use. (Amended Plan No. 459.1G received on 16.9.85).	Permission Granted (18/11/1985)
84/1163	Demolition of existing buildings and erection of 5 No. nursery/studio/workshop units with ancillary car parking and turning areas. (Drawing No. 459/2C received on 26.10.84 and Drawing No. 459.1C received on 5.11.84).	Permission Granted (17/12/1984)
81/0710	Erection of prefabricated building for repair and servicing of vehicles in connection with haulage and furniture removal business.	Permission Granted (09/09/1981)
7 Sandycombe Road		
00/0065	Retention Of Non-illuminated Fascia Signs.	Permission Granted (25/07/2000)

89/0202/FUL	Single storey rear extension	-
Unit 1 Sandycombe Centre		
96/1673/FUL	Retention of container for one year	Withdrawn by the Applicant (12/09/1996)

Adjacent sites of relevance

11 Sandycombe Road		
(Excluding discharge of conditions applications and advertisement consents)		
LPA Ref.	Proposal	Decision
15/2440/VRC	Variation of condition 2 of application 08/4792/FUL to allow for amendments including: - Introduction of clerestory windows to eastern elevation of office building; - 2 Conservation rooflights added to front (western) elevation of residential building; - 2 Conservation rooflights added to roof slope to flank wall on northern elevation.	Permission Granted (04/08/2015)
08/4792/FUL	Redevelopment of site to provide new single storey commercial building and 2 storey building comprising 4 x 2-bedroom dwellings	Permission Refused (21/02/2014) Appeal Allowed (17/09/2014)
04/1000/FUL	Erection Of Single-storey Rear Extension And Roof-top Fire Escape.	Permission Granted (07/10/2004)
01/3135	Proposed Development Of 11 Flats, Associated Car Parking And Site Works.	Permission Refused (14/06/2002)

- 3.2 The planning history indicates that planning permission for the buildings on site was granted under LPA Ref: 84/1163. The description notes that this development was for nursery/studio/workshop units. A subsequent application approved the retention of the first floor as Class III and changes the use of part of the ground floor to Class X. Class III is light industrial and Class X is a wholesale warehouse or repository under the Town and Country Planning (Use Classes) Order 1972.
- 3.3 Given the history and the uses on site, it is clear that there is a mix of commercial uses on site with an element of retail and sales at ground floor.
- 3.4 In December 2015 an application was made for “Redevelopment of the site to provide for a mixed-use development comprising 535 m² of B1 office space and 20 residential units, together with car parking and landscaping”. That application was presented to committee with a recommendation for approval by officers in August 2016.
- 3.7 However the committee refused the application for the following four reasons:

U09451 Refusal 1 - height, scale and mass

The proposed development, by virtue of its excessive height, scale and mass would be an inappropriate form of development that would fail to relate well to the local scale of surrounding properties, therefore having an adverse impact on the immediate streetscene and the character and appearance of the wider area in general, contrary to the National Planning Policy Framework, the London Plan and the Council's Local Plan, in particular policies CP7 of the Core Strategy 2009; DM DC 1 of the Development Management Plan 2011; and the adopted Kew Village Planning Guidance (2014).

U09452 Refusal 2 - design and fenestration

The proposed development, by reason of its inappropriate design and elevational treatment, including fenestration, would fail to relate well to the character of the locality, therefore being of detriment to the general visual amenity of the area, contrary to the National Planning Policy Framework; the London Plan; and the Council's Local Plan, namely policies CP7 of the Core Strategy 2009; DM DC 1 of the Development Management Plan 2011; and the adopted Kew Village Planning Guidance (2014).

U09454 Refusal 3 - affordable housing

No affordable housing is proposed to be provided on-site and without a binding agreement to secure a financial contribution towards affordable housing provision elsewhere, the proposal would fail to adequately contribute to the Borough's housing stock or maximise affordable housing in accordance with the sequential test for redevelopment of employment floorspace, thus contrary to the National Planning Policy Framework; and the Council's development Local Plan, in particular policies CP15 and CP19 of the Core Strategy 2009; DM EM 2 and EM HO 6 of the Development Management Plan 2011; and the adopted 'Affordable Housing' Supplementary Planning Document.

U09455 Refusal 4 - transport and highways

Without a binding agreement to secure the removal of rights to parking permits for prospective residential and business occupants or to require prospective households to have access to car club membership for a period of 5 years from the date of first occupation of the residential units, the scheme would have an adverse impact on local parking and road safety conditions in the surrounding roads. Furthermore, the application would fail to adequately promote sustainable modes of transport. As such, the proposal is contrary the aims and objectives of the National Planning Policy Framework; policy 6.13 of the London Plan; and the Council's Local Plan, in particular policies CP1 and CP5 of the Core Strategy 2009; DM TP 1, DM TP 2 and DM TP 8 of the Development Management Plan 2011; and the adopted 'Front Garden and Other Off-Street Parking' and 'Planning Obligations' Supplementary Planning Documents.

3.8 An appeal has been lodged against that decision and a public inquiry is to be held in April 2017.

4 PROPOSED DEVELOPMENT

4.1 As noted in Section 1 of this Statement, the proposal is for the:

“Redevelopment of the site to provide for a mixed-use development comprising 535 m² of commercial space and 20 residential units, together with car parking and landscaping”

4.2 This application is a re-submission of an earlier refused application with external changes to address the refusal reasons

4.3 A fuller description of the proposed Development is contained within the Design and Access Statement.

Proposed use

4.4 The development would comprise a part three, part four and part five storey building to provide 535 m² of office floorspace and 20 residential units.

Access

4.5 Both pedestrian and vehicular accesses will continue to be from Sandycombe Road.

Car and Cycle Parking

4.6 The development provides 15 car parking spaces (including two wheelchair parking spaces) and one van parking space. Eight of the spaces are contained within a stacker system. The parking is provided in the north portion of the site, between the main building and 11 Sandycombe Road. The vehicular access is separated from the main pedestrian entrance to avoid conflicts between different transport modes.

4.7 There is the provision for a total of 46 cycle spaces for the residential units and for the commercial units in cycle stores. In addition 4 visitor spaces are provided at the site entrance.

External Amenity

- 4.8 All the residential units have been provided with a relevant level of private amenity space. All the units will have private balconies or terraces.

5 SUMMARY OF CONSULTATION

Consultation with Statutory Authorities

- 5.1 Formal pre-application advice was taken from London Borough of Richmond Upon Thames on two separate occasions prior to the submission of the previous application:
- Meeting and discussion on 4th August 2015; and
 - Meeting and discussion on 20th of October 2015
- 5.2 The verbal pre-application advice received from the Council was fully reviewed, with that scheme amended accordingly in line with that advice from officers.
- 5.3 Consultation was also undertaken with the local ward members. A range of local community groups were contacted before the public exhibition. Invitations to the public exhibition were sent to local residents, councillors, members of the London Assembly and of Parliament. The public exhibition was also held locally on 3rd December and comments on the proposed scheme received were taken into account. This is addressed in the Statement of Community Involvement (SCI).

6 PLANNING POLICY CONSIDERATIONS

6.1 In accordance with Section 38 (6) of the Planning and Compulsory Purchase Act 2004, planning applications should be determined in accordance with the development plan unless other material considerations indicate otherwise.

6.2 The relevant Development Plan for the site is:

- The National Planning Policy Framework
- The London Plan – Consolidated with alterations since 2011 (March 2015);
- Core Strategy (adopted 2009);
- Development Management Plan (adopted 2011)
- Adopted Supplementary Planning Documents

Designations/Allocations

6.3 The site has the following planning policy designation in the adopted plan:

- Proposed Area for Tree Planting (Southern corner of the site)

6.4 The Council has commenced work on a formal review of its Local Plan. The latest draft plan was published for consultation in July/August 2016 and the applicant made comments on the draft plan. The draft plan proposed to include the site within a 'Locally important industrial land and business park' to which objections have been made.

Employment Use

6.5 The NPPF outlines the benefits that mixed use developments containing both residential and employment land uses can have in supporting the vitality and strategic functions of an area. This is a view supported by London Plan Policy 4.2 that supports the creation of mixed uses and the redevelopment of office provision as a way of improving London's competitiveness. The policy goes on to support the conversion of surplus office space into other uses conditional on minimal local demand.

- 6.6 The London Plan states that the London Borough of Richmond has the lowest projected employment growth out of all the London Boroughs – set at 2.7% growth between 2007-2031. In spite of this, Policy 2.7 of the London Plan which discusses the importance of the Outer London Economy states that proposals that create distinct and attractive mixed use developments that can attract new businesses will be encouraged where appropriate. In addition, as a way of maximising the strengths of outer London’s office market live/work units should be encouraged.
- 6.7 Policy 4.1 of the London Plan affirms the need for Boroughs to cultivate a strong and sustainable outer London economy. It should be ensured that there is an appropriate variety of workspaces for both small and large employers. Policy 4.12 emphasises the importance of developments that support local employment. Boroughs should encourage proposals that provide easier access to jobs and negate the need for long distance commuting.
- 6.8 Policy CP19 of the Core Strategy states that a diverse and strong local economy will be supported by, inter alia, ‘*retaining land in employment uses for business, industrial or storage*’, and ‘*requiring mixed use scheme to retain the level of existing employment floorspace*’. However, the inclusion of residential use within mixed use schemes will not be appropriate where it would be incompatible with established employment uses on neighbouring sites and prejudicial to their continued operation.
- 6.9 The Development Management Plan takes the same stance as the Core Strategy with regards to the creation and retention of the Borough’s employment space. Policy DM EM 1 of the Development Management Plan 2011 describes how employment uses in developments should be flexible and adaptable to meet the local, current and future requirements of businesses and small firms.
- 6.10 Policy DM EM 2 of the Development Management Plan states that the use of employment land for other uses will only be permitted where:

b) a sequential approach has been applied to the development of the site as follows:

- i. solely employment based redevelopment;*
- ii. mixed use or other alternative employment creating uses, where the employment floorspace is retained. Such sites should maximise the amount of affordable housing provided as part of the mix;*
- iii. maximum provision of affordable housing in accordance with CP19;*

- 6.11 Policy DM EM 2 further notes that proposals for Mixed Use schemes must maintain or improve the amount of employment floorspace on site.

Employment Use Assessment

- 6.12 The scheme proposes the loss of the existing use on site and seeks to replace the building with a mixed use development comprising commercial and residential uses. Policy DM EM 2 notes that a sequential approach must be applied to the development of the site. It is considered that an entirely employment based redevelopment of the site will not be viable due to the site's constraints. The proposal seeks to provide a development which would provide better quality employment floorspace which in turn will create more jobs.

Marketing

- 6.13 An original Marketing Report was produced in connection with previous application in December 2015 and updated in March 2016. The November 2016 Update now submitted reflects the continued marketing of the buildings since then until the present day.
- 6.14 In terms of the potential of the site as potential industrial space the submitted Marketing Report Update (when read in connection with the previous reports) advises that despite extensive advertising in local, regional and national platforms, the small modular units on site did not attract any enquiry from small-sized businesses or commercial occupiers. Apart from some tentative enquiries, the agents were unable to find occupiers willing to buy or rent the property.
- 6.15 The Marketing Report points out that '*demand for business space tend to be for modern space in better established business locations*', in other parts of the Borough of Richmond or in the nearby business parks and employment clusters. Because of this market trends and of the poor condition of the existing building on site, the marketing exercise undertaken by Vokins over a period of over 21 months has been unsuccessful in identifying demand for the current use and built form.
- 6.16 The site has been marketed and in a flexible manner for employment use both in its existing form and as a redevelopment opportunity. Evidence of this is set out in the submitted Marketing Report Update from Vokins. This demonstrates that there is no interest in the current outdated floorspace. As such, there is a strong case for the regeneration of the existing employment uses on site as part of a mixed use site and its replacement with appropriate modern floorspace as part of the mixed use scheme.

Introduction of flexible commercial use

- 6.17 The site is vacant so there is no existing employment on the site. The proposal makes provision for 535m² of employment floorspace suitable for occupation as separate units on the ground and part of the first floor of the new building. Whilst the exact nature and division of the space is at this time unknown, application of recognised worker/floorspace ratio (Employment Densities Guide 2nd Edition 2010) gives an idea as to the level of potential employment this might generate if occupiers can be found. Therefore adopting a B1 office use would suggest that the site has the potential to provide for around 44 jobs. This would be a significantly higher number of potential jobs than with any reoccupation of the existing floorspace as light industrial/warehouse or a mix of the two.
- 6.18 It is therefore considered that the provision of replacement commercial floorspace here would meet an identified need, would maintain the employment use of the site, and increase the number of people employed. It would assist with the loss of space elsewhere where this has been lost through the use of 'permitted development rights'. This was confirmed by officers at the first pre-application meeting.
- 6.19 For these reasons, it has been agreed with the Council to provide high-quality and flexible commercial spaces on site, thus reinstating active employment uses in an under-performing employment site. The new commercial units would be of the high quality design and sustainability standards and could be let as discrete 'start-up' offices or as a single office for a larger company. As a result, the employment use of the site would be enhanced and the scheme would align with the objectives of the current and emerging documents of the local development plan.
- 6.20 Whilst the Council refused the previous application there was no refusal on land use grounds and therefore it is considered that the proposed level and type of employment floorspace is acceptable. The applicants have objected to the proposed designation of the site as a 'Locally important industrial land and business park' in the draft Local Plan.

Residential Land Use

- 6.21 The NPPF states that boroughs are expected to deliver a "wide choice" of homes that offer a mix of "sizes, types and tenures" and advocates the implementation of larger scale developments, where appropriate, in order to meet local housing targets.
- 6.22 London Plan Policy 1.1 Developments should be realised that can assist the city in meeting the challenges created by future population growth.

- 6.23 Policy 3.3 of the London Plan explains the need for each London Borough to increase their housing stock in order to meet future change in population. It suggests the encouragement of the re-use of brownfield sites, the implementation of mixed use schemes and the intensification of land.
- 6.24 Core Strategy Policy CP14 Housing states that the Council will exceed the minimum strategic dwelling requirement. The policy does not relay the latest London Plan figures which require 315 dwellings per annum between 2015 and 2025 (London Plan 2015, Table 3.1).
- 6.25 Core Strategy Policy CP1 regards the sustainable and efficient use of land in the Borough. It states that redevelopment of existing built on sites should only occur where there can “be an increase in the number of housing units and/or quality commercial floor space”. Further, schemes should minimise their use of current open space and maintain any natural vegetation on site.
- 6.26 Policy CP 14 of the Core Strategy states that housing targets are capable of being met without resulting in the loss of employment space. However, on those employment sites that are no longer viable this loss may be acceptable. Mixed use schemes are encouraged as they would intensify land to serve both employment and residential needs.
- 6.27 DM HO 4 in Richmond’s Development Management Plan recognizes the need for more homes in the Borough. The policy however specifies that new homes should not adversely impact the character or amenity of the existing townscape.

Residential Land Use Assessment

- 6.28 The scheme provides for 20 residential units as part of a mixed use scheme. As stated in CP14 the Borough reaches its housing targets through not just allocated sites alone but also from windfall and infill sites. As such, housing on this site would be appropriate on the condition that it would not:
- adversely impact the character of the area
 - put unnecessary pressure on the existing amenities of the area
 - result in a net loss of employment space or open space
- 6.29 The proposal has taken into account the above considerations, as has been explored within this statement. It is considered that this location is well suited for a mixed use scheme incorporating employment space and residential accommodation.

Affordable Housing

- 6.30 The NPPF states that it is a requirement that developments address the current and future housing demands of the local population. In particular, there is a requirement for these developments to provide a degree of affordable housing subject to viability. Similarly, Policy 3.8 in the London Plan explains that a level of affordable housing must be provided in line with requirements of the Local Authority's own guidelines subject to individual site characteristics and viability.
- 6.31 The London Plan states that Local Authorities must ensure there are enough homes to meet the needs of Londoners at all stages of their lives and whatever their circumstances.
- 6.32 Policy 3.8 explains the need for all London residents to be able to have a choice of homes to live in that covers different sizes, price ranges and tenures and that is accessible to the needs of current and future communities. London is expected to deliver by 2017, 144,000 market homes and 182,000 affordable homes, with a minimum of 13,200 affordable homes being constructed a year.
- 6.33 Policy 3.9 of the London Plan goes on to say that development must be designed to cultivate mixed and well balanced communities and to discourage segregation. This can be achieved through the incorporation of heterogeneous housing tenures, sizes and costs.
- 6.34 Policy CP13 of the Core Strategy 2009 emphasises the need for Richmond to cater for and meet the needs of all future communities - particularly those who may be disadvantaged by age, ability or income.
- 6.35 Policy CP15 of the Core Strategy references the need for affordable homes directly, stating that it is the expectation for all new developments comprising of ten or more units to feature an on-site provision of 50% affordable units subject to individual site viability. Where this is not practical on site, a financial provision should be made off site.
- 6.36 Development Management Plan's Policy DM HO 4, with regard to the quality of residential schemes, states that housing mix and density should be appropriate to the location, should comply with space standards, be of a high quality of design and have usable amenity space. Outside of town centres there should be an emphasis on family housing.
- 6.37 Policies DM HO 5 and DM HO 6 of the Development Management Plan explain the requirements for all residential developments to meet the needs of the community by providing a variety of tenures. If the site allows, the Council will seek the maximum reasonable amount of affordable housing.

Affordable Housing Assessment

- 6.38 The proposal is for a total of 20 residential units on the site. All are proposed as market units. The application is therefore supported by a Viability Appraisal that demonstrates that the site is unable to support any affordable housing.

Housing Mix

- 6.39 Policy 3A.5 in the London Plan states the requirements for new dwellings to provide a mix of housing sizes and in particular, emphasises the need for more family housing in the borough. Of the boroughs existing housing stock, 34% have 3 or more bedrooms and 35% have two bedrooms. This is not enough to meet current needs within the borough.
- 6.40 The Core Strategy's Evidence Base states that the housing type currently experiencing the most pressure in the Borough is the affordable family housing market. This is a view supported by CP15, which expects affordable housing to cater to larger family units. A family unit is defined by the Residential Developments Standards SPD as a self-contained dwelling with 3 or more bedrooms.
- 6.41 Policy CP14 of the Core Strategy 2009 outlines the need for residential developments to be designed to cater for every community. Developments will be resisted where they fail to provide suitable family accommodation in areas that are able to support them.
- 6.42 Development Management Plan's Policy DM HO 4 explains that housing mix and density should be appropriate to the location. In areas that are predominantly residential in character, the emphasis should be on family sized accommodation. Though there should also be the provision for single person households.

Housing Mix Assessment

- 6.43 The scheme proposes a mix of dwelling sizes. The proposal is to provide 2 studio flats, 7 one-bedroom units, 7 two-bedroom units (comprising 2 wheelchair accessible units) and 4 three-bedroom units. It therefore provides for 45% 1 bed units in accordance with adopted policy, reflecting its accessible location and the need to retain employment use on the site.

Amenity

- 6.44 The NPPF states that developments must identify and address specific needs and deficits of open space, play space, sports and recreational facilities in the local area.
- 6.45 The London Plan's Policy 3.6 addresses those residential schemes that are likely to house young people and children. Such schemes will be resisted where they fail to make a provision for informal recreation, open spaces and good quality, well designed and accessible play spaces. Policy 7.18 follows on from this, stating that all developments should provide, or else make a contribution towards an adequate and accessible level of green and open space for existing and future residents.
- 6.46 Policy 3.5 of the London Plan states that all new dwellings should take into account the relationship between density and the "provision of public, communal and open spaces".
- 6.47 Policy CP10 of the Core Strategy 2009, in accordance with the London Plan, affirms that practical opportunities should be taken to improve the provision of recreational facilities such as children's play areas. Policy CP17 of the Core Strategy states that new developments where appropriate should assist residents in living a healthy lifestyle by providing open and play facilities.
- 6.48 Policy DM HO 4 of the Development Management Plan 2011 states that developments that fail to provide adequate external private and/ or communal amenity space to meet the needs of future residents will be resisted. Further, new amenity space should be, usable, functional, safe, accessible and of a sufficient size and design to meet the requirements of all residents.
- 6.49 Policy DM OS 6 of the Development Management Plan outlines the Council's commitments in ensuring that developments contribute towards the improving and enhancing of recreation space within the Borough. If insufficient amenity space is provided on site, a financial contribution would be required for amenity space elsewhere.
- 6.50 With regard to the provision of children's play facilities, Policy DM OS 7 of the DMP goes on to say that developments with an estimated occupancy of ten or more children should provide an appropriate play provision on site. Where this provision cannot be met, an equivalent financial contribution would be required.

Amenity Assessment

- 6.51 The proposal will not result in the generation of enough children to require on site playspace provision. It is well located in relation to outdoor space as indicated in the Health Impact Assessment (HIA).
- 6.52 The scheme at ground floor level will comprise a single permeable block paved surface that would wrap around the main building. This surface will be occupied by the car parking in the north portion of the site while in the front of the entrances to the ground floor commercial space and upper floor units it would become a landscaped walkway. The amenity terrace located to the south of the building would also be paved.
- 6.53 The southernmost corner of the site would be planted with biodiverse planting and would comprise areas of bench seating. New trees and plants would be inserted along the street boundary to create a visual transition between the public realm and the amenity spaces of the new development. A buffer of planting will be provided along the eastern boundary of the site between the building and the boundary of the railway line.
- 6.54 The building will have green roofs. This sustainable design choice will enhance and increase biodiverse planting in the area, attract birds, insects and other small animals and would give a more attractive appearance to the building.
- 6.55 Further details of the amenity benefits of the scheme are contained in the attached Design and Access Statement, Landscape Concept Plan and Arboricultural Report.

Space Standards

- 6.56 Policy 3.5 of the London Plan outlines the design requirements put upon all new houses in London, outlining that they must be attractive and spacious, “generally conforming with” minimum space standards as shown in the table below.

Table 3.3 of the London Plan 2015 - Minimum space standards for new development

	Dwelling type (bedroom (b)/persons-bedspaces (p))	GIA (sq m)
Flats	1p	37
	1b2p	50
	2b3p	61
	2b4p	70
	3b4p	74
	3b5p	86
	3b6p	95
	4b5p	90
	4b6p	99
2 storey houses	2b4p	83
	3b4p	87
	3b5p	96
	4b5p	100
	4b6p	107
3 storey houses	3b5p	102
	4b5p	106
	4b6p	113

Space Standards Assessment

- 6.57 Flats within the development range from studio flats up to three-bedroom four person flats. Each flat complies with the GIA space standards outlined in the London Plan and in many cases actually exceeds them.
- 6.58 The proposed scheme fully complies with and exceeds the space standards of the London Plan ensuring a good quality of internal amenity for the future occupiers of the development.
- 6.59 The proposal is also supported by a 'Residential Standards Statement' and a Wheelchair Housing Statement that demonstrate compliance with standards.

Design

- 6.60 The NPPF stresses the importance of good design. It emphasises that design is a key requirement in all developments due to its contribution towards making places better for people.
- 6.61 The London Plan's Policy 3.2 says that developments should be designed that would enable Londoners to live in well-designed homes, appropriately sized, energy efficient, warm, dry and safe.
- 6.62 Policy 7.6 of the London Plan introduces a number of key design guidelines to which a development would have to adhere, in order to better increase its chances of securing planning permission. A development should:
- a. *Be of the highest architectural quality;*
 - b. *Be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm;*
 - c. *Comprise details and materials that complement, not necessarily replicate, the local architectural character;*
 - d. *Not cause unacceptable harm to the amenity of surrounding land and buildings;*
 - e. *Incorporate best practice in resource management and climate change;*

- f. *Provide high quality indoor and outdoor spaces;*
- g. *Be adaptable to different activities and land uses, particularly at ground level;*
- h. *Meet the principles of inclusive design;*
- i. *Optimise the potential of sites.*

6.63 Policy 7.2 of the London Plan addresses inclusive design and notes that developments should be designed so as they can ‘*be used safely and easily by all regardless of disability*’.

6.64 London Plan’s Policy 7.4 explains how developments should relate to the existing site context. New buildings should respect the character and existing urban grain of the area. They should provide a ‘*human scale*’ and go towards enhancing and encouraging positive activity at street level activity.

Design Assessment

6.65 The development of the design of the proposed scheme has been the subject of development through the pre-application process and also through community engagement. The scheme has been reduced in height and mass since the original design concept in line with officer’s recommendations and the external appearance has been revised in response of the refusal reasons..

6.66 The potential impact of the development on the residential amenity of adjoining occupiers and the future occupiers of the development has been assessed in terms of daylight/sunlight. There will be no adverse impact on adjoining occupiers and the future occupiers will enjoy a good level of light into their units, particularly given the reduction in height of the scheme. This is addressed in the submitted Sunlight/Daylight Assessment.

6.67 The development of the design is also amplified in the Design and Access Statement, which demonstrates that the proposal would satisfactorily relate with the adjoining properties and would enhance the character and appearance of the surrounding area. Revisions have been made to the external appearance of the earlier refused scheme to address the refusal reasons in this respect.

Accessibility and Lifetime Homes

- 6.68 The London Plan Housing SPG affirms that all new developments should have 10% of units fully wheelchair accessible. These wheelchair accessible units must be distributed across all tenures and evenly spread throughout the development.
- 6.69 Policy CP14 of the Core Strategy states that the density of residential proposals should take into account of its local context, whilst respecting the quality, character and amenity of established neighbourhoods. All housing should be built to Lifetime Homes standards with 10% of all new housing built to wheelchair standards.

Accessibility and Lifetime Homes Assessment

- 6.70 Provision is made for 2 adaptable wheelchair apartments and all units will be designed to comply with Building Regulations requirement M4 (2) (Accessible and Adaptable Dwellings) and the Lifetime Homes Standards. Details of this aspect of the proposal are contained in a separate document titled 'Accessible and Adaptable Dwellings Statement'.

Sustainability

- 6.71 The London Plan policy 5.2 states that all developments must be designed in a way that minimises carbon emissions with policy 5.3 going on to say that sustainable design, construction and operation must be integral to the overall scheme. Major development proposals should achieve the following sustainable design principles:
- a. Minimising carbon dioxide emissions across the site;
 - b. Avoiding internal overheating;
 - c. Efficient use of natural resources;
 - d. Minimising pollution;
 - e. Minimising the generation of waste and maximising reuse or recycling;
 - f. Avoiding impacts from natural hazards (such as flooding);
 - g. Ensuring developments are comfortable and secure for users;

- h. Securing sustainable procurement of materials, using local supplies where feasible;
- i. Promoting and protecting biodiversity and green infrastructure.

6.72 London Plan's Policy 5.9 requires major development proposals to demonstrate how the design, materials, construction and operation of the development would minimise overheating and also meet its cooling needs.

6.73 Green roofs, walls and site greening should be encouraged in all new developments, as stated within London Plan Policy 5.11.

Energy and Sustainability Assessment

6.74 The application is supported by the Sustainability Statement produced by Ensphere. This report states that the non-domestic part of the scheme will be assessed against BREEAM standards with a target rating of "Excellent". It also demonstrate that the energy strategy adopted on the site will be consistent with the Energy Hierarchy advocated by the London Plan and will satisfy the London Plan's 35% carbon reduction target and the latest 'Zero-Carbon' requirements. Further details of the sustainability measures proposed in the scheme are also contained in the submitted Energy Statement and Sustainability Statements.

Public Transport

6.75 The NPPF affirms that new developments should relate to existing sustainable transport hubs. It states that schemes generating "significant movement" should be located as such to minimise car use and maximise sustainable modes of transport.

6.76 London Plan Policy 6.1 encourages the integration of transport and development, stating that schemes should be located as such to reduce the need to travel, particularly by car, and should overall, improve the accessibility of public transport, walking and cycling.

Public Transport Assessment

6.77 The site enjoys good access to public transport and local services and is within walking distance of North Sheen National Rail station and Kew Gardens underground/overground services. The benefits of locating a mixed-use development in this site are analysed in more detail in the Transport Assessment and the draft Travel Plan submitted with this application.

Car Parking

- 6.78 Policy 6.13 of the London Plan explains that whilst new development must be encouraged, there must be measures in place to prevent a reliance on cars where cycles or public transport could be used instead. The car parking provision must be proportional to the PTAL rating of a development.
- 6.79 The Addendum to Chapter 6 in the London Plan explains in detail the requirements for disabled parking on new developments, stating that developments should provide at least one parking space for blue badge holders that are as close as practical to the main entrance of the building.
- 6.80 The London Plan Housing Guidance SPG provides guidance on the number of parking spaces required per habitable room, in relation to PTAL rating. The Council have aspired to apply the maximum parking standards in this location with provision of 1:1 for 1-2 beds and 2:1 for the 3 bed units.

Parking Assessment

- 6.81 Provision is made for a total of 15 car parking spaces together with a van servicing bay serving both the office units and the flats. Details of the levels of parking provision are addressed in the attached Transport Assessment. This complies with the London Plan and local plan policy.

Cycle Parking

- 6.82 The London Plan Policy 6.9 says there is a requirement for all developments to provide “secure, integrated and accessible parking facilities” in order to encourage cycling and deter car usage. Dwellings should provide, as a minimum, 1 cycle space per 1 bed units and 2 cycle spaces per 2 or more bed units.

Cycle Parking Assessment

- 6.83 The proposal comprises an external cycle store that will accommodate 46 cycle for the residential units and for the commercial units) and 4 visitor spaces. This provision is addressed in detail in the Transport Assessment.

Flood Risk

- 6.84 The application is supported by a Flood Risk Assessment which includes a Sustainable Urban Drainage Systems Strategy.

Planning Obligations/CIL

- 6.85 The Council has adopted its CIL Charging Schedule and the provision under this regime will provide for any necessary infrastructure requirements. It is not anticipated that there will be any additional provision needed under the Councils Obligations SPD.

7 SUMMARY AND CONCLUSION

- 7.1 The proposal is for the redevelopment of this tired employment site with a mixed use scheme to provide 535m² of employment floorspace at ground and part first floor level and 20 residential units. The proposal provides for car parking, new landscaped communal areas at ground floor level and green roofs.
- 7.2 The proposal will provide an attractive new development in place of the existing metal clad-warehouse building. The scheme will have aesthetic and practical benefits for the site and surrounding area. Furthermore, the building has been designed to achieve high environmental standards, minimise emissions of carbon and pollutants, enhance the ecological value and biodiversity of the site and improve resource efficiency.
- 7.3 As a result of the proposal, the total number of jobs on site will be higher than those previously active on the now vacant building. The new flexible offices will guarantee a continued employment use of the site and would be located in proximity of public transport routes.
- 7.4 The previous proposals were the subject of pre-application discussions with the Council, neighbours of the application site and the wider local community. Their observations and suggestions have been well received and the previous proposal was reduced in scale through this process so that it respected and enhanced the character of the area. The proposal's external appearance has been amended following the earlier committee decision.
- 7.5 The application is supported by a number of technical reports that demonstrate the compliance of the scheme with adopted planning policies at local, regional and national level. We therefore consider that the proposal should be approved.

