



PLANNING STATEMENT

In Respect Of:

**KINGSWAY MEWS,
REAR OF 127-147
KINGSWAY, MORTLAKE,
SW14 7HN**

With Regard To:

**AMENDED SCHEME:
DEMOLITION OF 38
GARAGES & ERECTION OF
SIX RESIDENTIAL UNITS &
TWO COMMERCIAL (B1A)
UNITS INCLUDING
ASSOCIATED WORKS**

On Behalf Of:


**SPACE SOLUTIONS UK
LIMITED**

JLA Ref: **JL/PB/223**
Date: **APRIL 2016**

Quality Control

All documents, material, or other information prepared by James Lloyd Associates Limited are subject to standard quality control procedures that must be signed by the James Lloyd Associates Principal. Documents without a signature have not been subjected to Quality Control procedures and should be treated as draft only. No responsibility or liability is accepted for the consequences of any document accepted or used by the Client or any other party that is not compliant with these procedures.

Approver:

..... 

James Lloyd Associates Principal

Report: FINAL

Date: 13 April 2016

Copyright

The contents of this document must not be copied or reproduced in whole or in part without the written consent of James Lloyd Associates Limited.

CONTENTS	PAGE(S)
1.0 INTRODUCTION	5
1.1 Introduction	5
1.2 Background & Objectives	6
1.3 Summary of Main Planning Issues	7
1.4 Structure of Statement	8
2.0 SITE DETAILS	10
2.1 Site Description	10
2.2 Context	12
3.0 PLANNING HISTORY & EVOLUTION OF THE SCHEME	17
3.1 Planning History	17
3.2 Case Examples – Planning History	17
3.3 Evolution of the Scheme	18
4.0 PROPOSED DEVELOPMENT	20
4.1 Description of Proposed Development	20
4.2 Applicant Requirements	22
5.0 RELEVANT PLANNING POLICY	23
5.1 Determining Applications for Permission	23
5.2 National Policy	23
5.3 Development Plan	24
6.0 MATERIAL PLANNING CONSIDERATIONS	27
<u>Assessment Against the Appeal Decision</u>	
6.1 The Effect of the Proposal on Parking & Highway Safety	27
6.2 The Effect of the Proposal on the Character of the Area	29
6.3 The Effect of the Proposal on the Living Conditions of Neighbours & Future Residents	33
6.4 Affordable Housing	35
<u>Other Material Considerations</u>	
6.5 Demolition	36
6.6 Land Uses	36
6.7 Density	39
6.8 Housing Need	39
6.9 Crime Prevention	40
6.10 Noise & Vibration	40

6.11	Sustainable Construction	41
6.12	Environmental Constraints	42
6.13	Planning Obligations	47
6.14	Community Engagement	48
7.0	CONCLUSIONS	49
7.1	Conclusions	49

APPENDICES

1. LBRuT Pre-Application Written Response dated 7 November 2014

2. Case Examples (Officer's Report, Decision Notice etc.):
 - i. 198-200 Armyard Park Road, Twickenham (08/3078/FUL) – Granted on 22 February 201
 - ii. 31-35 Railway Road, Teddington (08/3314/FUL) – Granted 29 on March 2010
 - iii. 54-76 Shacklegate Lane, Teddington (08/3355/FUL) – Granted on 29 March 2010
 - iv. 92-102 Sherland Road, Twickenham (08/4195/FUL) – Granted on 6 May 2010
 - v. 42-44 Charles Street, Barnes (10/1484/FUL) – Non-Determination: Refusal. Allowed on appeal on 1 March 2011

3. Public Consultation
 - i. Exchanges of Correspondence
 - ii. Leaflets and Boards
 - iii. Public Consultation Photographs
 - iv. Resident Written Responses

1.0 INTRODUCTION

1.1 Introduction

1.1.1 This Planning Statement (hereafter referred to as the 'Statement') has been prepared by James Lloyd Associates Limited in support of a proposal for mixed-use (residential and commercial) development, submitted on behalf of Space Solutions UK Limited (hereafter referred to as the 'Applicant'), with regard to Kingsway Mews, Rear of 127-147 Kingsway, Mortlake, SW14 7HN (hereafter referred to as the 'Site').

1.1.2 This Amended Full Planning Application (hereafter referred to as the 'Application') seeks consent from the London Borough of Richmond upon Thames (hereafter referred to the 'Council') for the:

“Demolition of 38 garages including vehicle repair garage and the erection of six residential units (2x 3 bed and 4 x 2 bed), incorporating two commercial (B1a offices) units (totalling 152 sq.m), with amenity space, off-street car parking and associated works.”

1.1.3 The original scheme for seven units (FP Application No. 15/0278/FUL / PINS Reference: APP/L5810/W/15/3133362) was dismissed at appeal following non-determination. The Inspector considered the following issues:

1. The effects of the proposal on parking and highway safety
2. The effects of the proposal on the character of the area
3. The effects of the proposal on the living conditions of neighbours and future residents
4. Whether the proposal should contribute to the provision of affordable housing

- 1.1.4 The Applicant has reviewed the inspector's reasons for dismissal and amended the scheme and provided additional supporting information to address these issues.
- 1.1.5 The scheme will consist of six houses and two commercial units. Four of the residential units will be two bedroomed houses and two will be three bedroomed houses. These houses will comprise ground and first floor levels. Each will have a private roof terrace. The commercial units will be housed within the existing bridge arches, complete with a contemporary glazed entrance extension. There will be a total of 14 car parking spaces, including one disabled.
- 1.1.6 It is important to note that the Inspector accepted that the proposal would result in a tidying up of the site and that it would give rise to additional homes in a broadly suitable location.

1.2 Background & Objectives

i. Background

- 1.2.1 The Applicant is the freeholder of the Site who wishes to redevelop the Site due to its physical and historical constraints, which is expanded upon within this Statement.
- 1.2.2 Where other developers are postponing development, the Applicant is keen to proceed with the scheme on the Site without delay, given the costs involved.

ii. Objectives

1.2.3 The proposed development is intended to achieve the important planning aims of regeneration and sustainable development, arising out of the Site's particular characteristics and accessible location, together with the existing planning policy context. The main objectives of the proposed development are:

- To enhance and improve the Site by sensitive redevelopment
- The effective and efficient use of the Site
- Removal of redundant and unattractive structures
- Provision of housing (family dwellings) that meets local demand and commercial (B1) floorspace

1.3 Summary of Main Planning Issues

1.3.1 In light of the appeal decision, we consider the main planning considerations to be:

- The effects of the proposal on parking and highway safety
- The effects of the proposal on the character of the area
- The effects on the living conditions of neighbours and future residents
- Whether the proposal should contribute to the provision of affordable housing

1.4 Structure of Statement

- 1.4.1 Section 2.0 describes the Site and its context; Section 3.0 sets out the planning history of the Site; Section 4.0 describes the proposed development; Section 5.0 sets out the relevant national, regional and local planning policy, and supporting planning policy guidance; Section 6.0 assesses the proposed development against the planning policy documents identified in Section 5.0. Conclusions are drawn in Section 7.0.
- 1.4.2 The purpose of this Statement is to draw out the key planning issues arising from the development proposals and to assess the proposals in light of the national, regional, and local planning policy. This Statement will demonstrate that the scheme accords with these policies.
- 1.4.3 In addition to this Statement, the proposed development should be read in conjunction with the following documents (in no particular order):
- Covering Letter and Forms / Planning Statement prepared by JLA Limited
 - Design and Access Statement including Drawings prepared by Brookes Architects:
 - 4594_03_001 - Site Location Plan
 - 4594_03_002 - Topographical Survey
 - 4594_03_003 - Proposed Site Plan
 - 4594_03_004 - Proposed Ground Floor
 - 4594_03_005 - Proposed First Floor
 - 4594_03_006 - Proposed Roof Terrace
 - 4594_03_007 – Proposed Elevations
 - 4594_03_008 – Proposed Sections
 - 4594_03_009 - Proposed Elevations Bin and Bike Store

- Noise Impact Assessment prepared by Sustainable Acoustics
- Transport Statement including Parking Survey prepared by Paul Mew Associates
- Arboricultural Report and Impact Assessment prepared by Crown Consultants
- Energy Strategy Report prepared Syntegra Consulting
- Daylight, Sunlight and Overshadowing Report prepared by Syntegra Consulting
- Phase 1: Environmental Risk Assessment prepared by RPS Group
- Flood Risk Assessment prepared by RAB Consultants
- Appeal Decision APP-L5810-W-15-3133362

1.4.4 This Statement draws upon the conclusion of these documents, as necessary.

2.0 SITE DETAILS

2.1 Site Description

2.1.1 Please refer to the supporting Design and Access Statement prepared by Brookes Architects.

2.1.2 The Site is approximately 0.14ha in size. It consists mainly of lock up garages with a combined Gross Internal Area (GIA) of approximately 5,800 square feet (sq.ft) / 539 square metres (sq.m). It also contains a single-storey vehicle repair garage of approximately 1,670 sq.ft / 155 sq.m GIA housed within the arches of the adjacent bridge. A metal canopy extends the coverage of the vehicle repair garage approximately 5.5 metres out from the bridge, with the remainder of the Site covered in hard paving.

Site Photograph - The Site Looking Towards the Bridge



Site Photograph - The Lock up Garages which Back onto the Boundary with the Railway



Site Photographs - The Lock Up Garages & The Vehicle Repair Garage



2.1.3 The Site is set back from Kingsway and is accessed through an access road approximately 3 metres (m) wide and 40m long between houses Nos.127 and 129 Kingsway. The rear gardens of Nos. 127 to 145 Kingsway bound the Site to the north and east. The southern boundary is adjacent to the railway line and the western boundary is adjacent to the Clifford Avenue Bridge that is part of the A205 South Circular Road. The arches under the bridge are occupied by the vehicle repair garage. The Site is not visible from the public footpath (Kingsway).

2.1.4 The existing entrance (accessed from Kingsway) is bound by the front garden walls of Nos. 127 and 129 Kingsway.

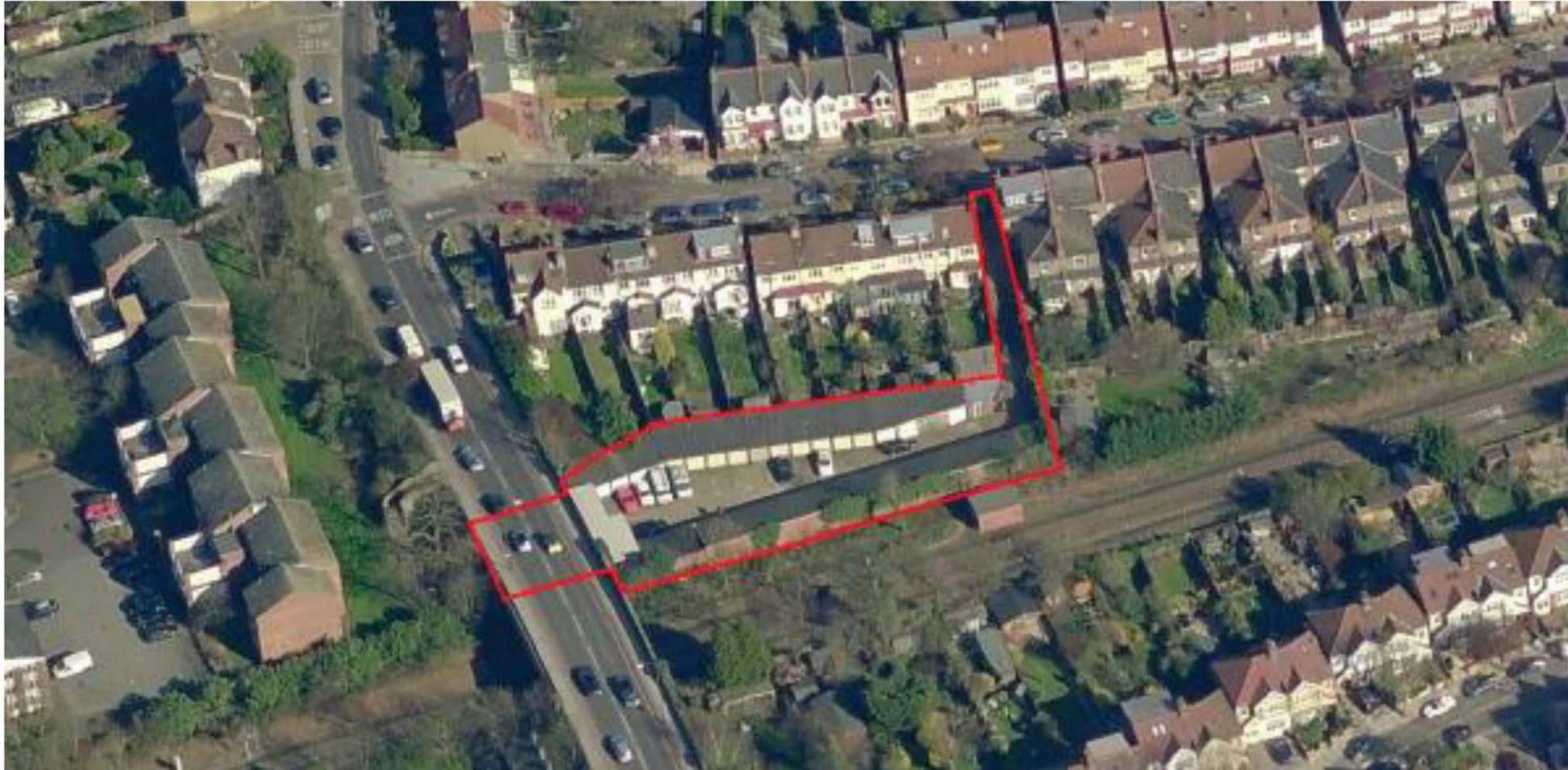
2.2 Context

2.2.1 Generally, the wider character of the area is predominantly residential. Currently, the southern boundary of the Site comprises a chain link fence. Beyond this is the railway track separated from the Site by overgrown shrubbery.

2.2.2 The bridge bounding the Site to the west is constructed from good quality brick. However, its appearance is hampered by the unsympathetic metal canopy of the vehicle repair garage which obstructs the view of the archways.

2.2.3 While the area is not in a designated Conservation Area, it could be argued that the general condition and appearance of the lock up garages detract from the nearby residential character of the area.

Aerial View of the Site & Surrounding Area (Indicative Red Line Boundary)



Source: Bing Maps (April 2016)

i. Heritage Assets

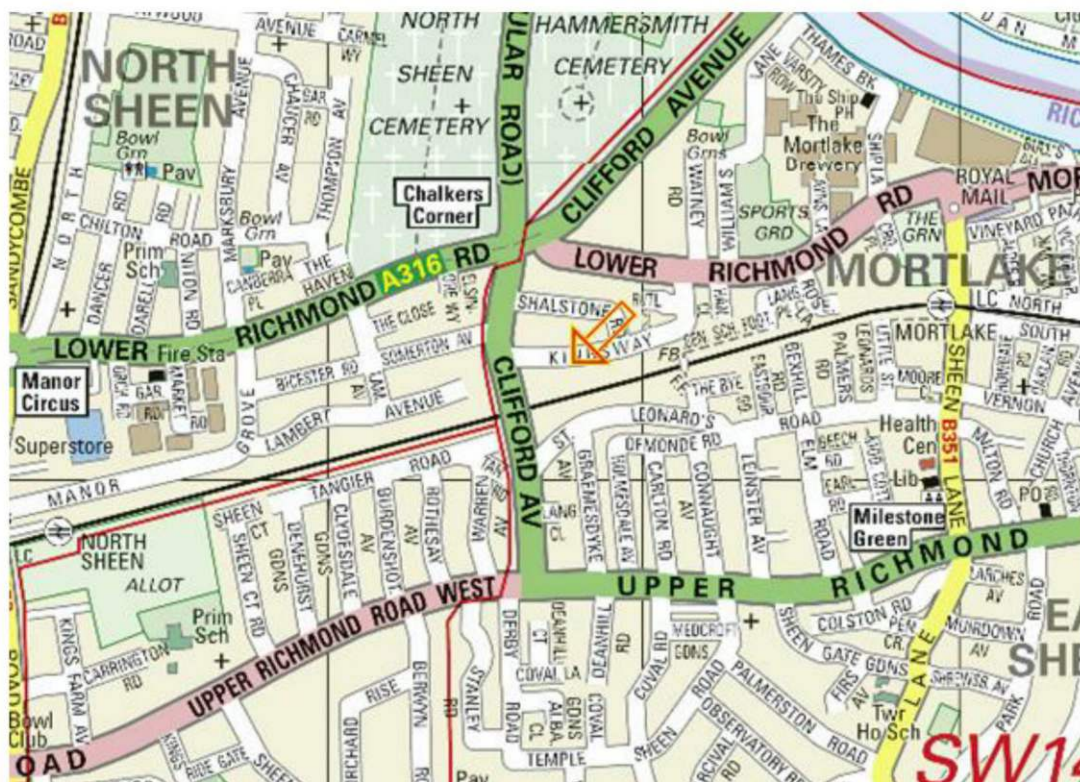
2.2.4 The Site is not designated within a Conservation Area. None of the structures, themselves, are statutorily or locally listed with no adjoining listed buildings.

ii. Transport & Accessibility

2.2.5 Please refer to the supporting Transport Statement prepared by Paul Mew Associates for details.

2.2.6 The Site has a Public Transport Accessibility Level rating of 2 (entrance to Kingsways) / 3, which is poor / moderate (TfL Planning Information Database). The Site is not located in a Controlled Parking Zone.

Street Map



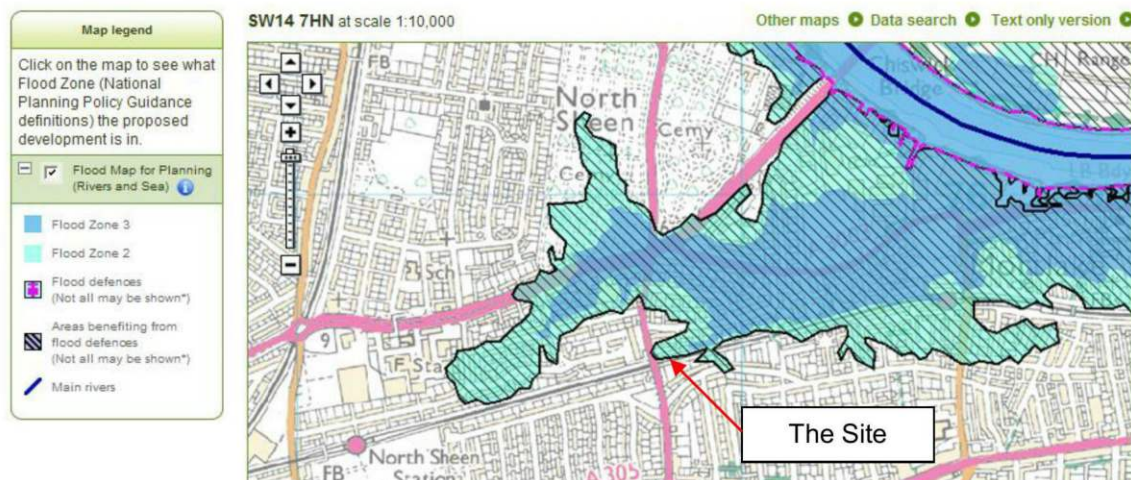
Source: Street Map (April 2016)

2.2.7 The area benefits from good communication links with the A316. North Sheen Railway Station is approximately 900 metres walking distance, which provides a regular commuter service to Central London. There are also numerous bus stops.

iii. Flood Risk

2.2.8 Please refer the supporting Flood Risk Assessment prepared by RAB Consultants.

Environment Agency – Flood Risk Map



Source: Environment Agency (April 2016)

2.2.9 The Site is located to the south of the River Thames and is in a Flood Risk Zone. Flood Zone definitions are set out in the National Planning Policy Guidance:

- Flood Zone 1 - land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%)

- Flood Zone 2 - land assessed as having between a 1 in 100 and 1 in 1,000 annual probability of river flooding (1% – 0.1%), or between a 1 in 200 and 1 in 1,000 annual probability of sea flooding (0.5% – 0.1%) in any year
- Flood Zone 3 - land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%), or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%) in any year

iv. Environmental Constraints

2.2.10 Please refer to the supporting Phase 1: Environmental Risk Assessment prepared by RPS Group.

2.2.11 The Site comprised open land from at least 1850 and by c.1913 a bridge associated with Clifford Avenue (road) had been constructed over the far west of the Site. By c.1933 likely domestic garages were present on the site and by c.1974 additional buildings (likely domestic garages) had been constructed. The Environmental Health Officer at the Council advised that the Site has been used for motor repair services. Planning information indicates that the railway arches in the west of the Site have been used as for storage and industrial purposes and as workshops

3.0 PLANNING HISTORY & EVOLUTION OF THE SCHEME

3.1 Planning History

3.1.1 A planning history search of the Site has been undertaken by making use of the online property search engine on the Council's website. There are none listed.

3.1.2 It is considered that the current use class of the Site, as garages and vehicle repair garage, is Sui Generis / B1c (light industrial) of the Town and Country Planning (Use Classes) Order 1987 and its subsequent amendments.

3.2 Case Examples – Planning History

3.2.1 The principle of redeveloping garaging of a similar nature for residential use is established with the Council granting permission for the following schemes (Please refer to **Appendix 2** of this Statement):

- 198-200 Armyard Park Road, Twickenham (08/3078/FUL) – Granted on 22 February 2010
- 31-35 Railway Road, Teddington (08/3314/FUL) – Granted on 29 March 2010
- 54-76 Shacklegate Lane, Teddington (08/3355/FUL) – Granted on 29 March 2010
- 92-102 Sherland Road, Twickenham (08/4195/FUL) – Granted on 6 May 2010

3.2.2 In addition, on 1 March 2011 an application for demolition of garages and redevelopment to provide five residential units and an office at 42-44 Charles Street was allowed on appeal (10/1484/FUL).

3.3 Evolution of the Scheme

i. Pre-Application Consultation – September 2014

- 3.3.1 A Request for Pre-Application Consultation was received by the Council on 16 September 2014 with a meeting taking place on 4 November 2014 with Planning and Design and Conservation Officers in attendance.
- 3.3.2 The Council's Pre-Application Written Response (**Appendix 1** of this Statement) was received via e-mail dated 7 November 2014. The Council has 'in principle' accepted the loss of the garages and proposed mixed-use (residential and commercial) development.
- 3.3.3 Following the Council's Pre-Application Written Response, the mix of residents was altered to provide 3 x 2 bed and 4 x 3 bed residential units with the car parking arrangements / layout altered. The communal amenity area and space between the proposed commercial units was reconfigured to provide a better degree of separation.

ii. Public Consultation – Early January 2015

- 3.3.4 Please refer to **Appendix 3** of this Statement.
- 3.3.5 On Wednesday 14 January 2015 (between 4.30pm to 7.30pm) Public Consultation with local residents, Ward Councillors, and any interested parties was undertaken at The Tapestry, 1 Lower Richmond Road, London, SW14 7EX. 50 Public Consultation Leaflets were mail dropped to residents along Kingsway, immediately adjacent to the Site, on 9 January 2014 and e-mails sent to a number of local residents who responded to the mail shot.

iii. Application Submission – Mid January 2015

- 3.3.6 There have been subsequent exchanges of correspondence between all parties with amendments made to the design in terms of elevation changes, with regard to treatment, and details on the use of materials.
- 3.3.7 It is considered that the Application, as now submitted, addresses all the issues raised by the Council that are assessed in full in Section 6.0 of this Statement.

iv. Planning Appeal – January 2016

- 3.3.8 An appeal was submitted due to the Council's failure to issue a decision within the relevant time-scale. The Council had indicated that it would have refused the application and has given putative reasons for refusal.
- 3.3.9 The Applicant has reviewed the inspector's reasons for dismissal and amended the scheme and provided additional supporting information to address these issues.
- 3.3.10 The scheme will consist of six houses and two commercial units. Four of the residential units will be two bedroomed houses and two will be three bedroomed houses. These houses will comprise ground and first floor levels. Each will have a private roof terrace. The commercial units will be housed within the existing bridge arches, complete with a contemporary glazed entrance extension. There will be a total of 14 car parking spaces, including one disabled.
- 3.3.11 It is important to note that the Inspector accepted that the proposal would result in a tidying up of the site and that it would give rise to additional homes in a broadly suitable location.

4.0 PROPOSED DEVELOPMENT

4.1 Description Proposed Development

4.1.1 This Application seeks consent from the Council for the:

“Demolition of 38 garages including vehicle repair garage and the erection of six residential units (2x 3 bed and 4 x 2 bed), incorporating two commercial (B1a offices) units (totalling 152 sq.m), with amenity space, off-street car parking and associated works.”

Drawing No. 4594_03_001 - Site Location Plan



Drawing No. 4594_03_007 – Proposed Elevations



4.1.2 The scheme will consist of six houses and two commercial units. Four of the residential units will be two bed roomed houses and two will be three bed roomed houses. These houses will comprise ground and first floor levels. Each will have a private roof terrace. The commercial units will be housed within the existing bridge arches, complete with a contemporary glazed entrance extension. There will be a total of 14 car parking spaces, including one disabled.

Area Schedules

Schedule of unit areas (gross internal)

RESIDENTIAL UNITS	METRIC (sq m)
Unit 1	165
Unit 2	127
Unit 3	132
Unit 4	132
Unit 5	127
Unit 6	165
TOTAL	848

COMMERCIAL UNITS	METRIC (sq m)
Office A	76
Office B	76
TOTAL	152

Schedule of Accommodation

UNIT	DESCRIPTION
Unit 1	3 bed, 5 person house
Unit 2	2 bed, 4 person house
Unit 3	2 bed, 4 person house
Unit 4	2 bed, 4 person house
Unit 5	2 bed, 4 person house
Unit 6	3 bed, 5 person house
Office A	N/A
Office B	N/A

Schedule of amenity spaces

USE	METRIC (sq m)
Private (Unit 1)	70
Private (Unit 2)	42
Private (Unit 3)	42
Private (Unit 4)	42
Private (Unit 5)	42
Private (Unit 6)	80
TOTAL	318

Proposed Perspective (View Looking South West towards Clifford Avenue)



4.2 Applicant Requirements

4.2.1 The present condition of the Site detracts from the overall character and appearance of the surrounding area. Consequently, an opportunity has arisen to build a landmark scheme. The Applicant would like to redevelop the Site to maximise its potential, while at the same time re-affirming its architectural character.

5.0 RELEVANT PLANNING POLICY

5.1 Determining Applications for Permission

5.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that when determining a planning application, regard is to be had to the Development Plan, and the determination shall be made in accordance with the plan unless material considerations indicate otherwise.

5.2 National

Department for Communities & Local Government (Published)

- National Planning Policy Framework (March 2012)

5.2.1 At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking (Paragraph 14).

5.2.2 Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.

5.3 Development Plan

i. Regional

Greater London Authority (Published)

- The London Plan: Spatial Development Strategy for Greater London (March 2015)

ii. Local

London Borough of Richmond upon Thames (Adopted)

- Local Development Framework: Core Strategy Development Plan Document (April 2009)

5.3.1 The relevant policies include (but are not limited to): CP1 (Sustainable Development), CP2 (Reducing Carbon Emissions), CP3 (Climate change – Adapting to the Effects), CP4 (Biodiversity), CP5 (Sustainable Travel), CP7 (Maintaining and Improving the Local Environment), CP14 (Housing), CP15 (Affordable Housing), CP17 (Health and Well-being), CP19 (Local Business).

- Local Development Framework: Development Management Plan Development Plan Document (November 2011)

5.3.2 The relevant policies include (but are not limited to): DM SD1 (Sustainable Construction), DM SD2 (Renewable Energy and Decentralised Energy Networks), DM SD3 (Retrofitting), DM SD4 (Adapting to Higher Temperatures and Need for Cooling), DM SD7 (Sustainable Drainage), DM OS5 (Biodiversity and New Development), DM OS7 (Children's and Young People's Play Facilities), DM EM 1 (Development for Offices, Industrial, Storage and Distribution Uses), DM EM 2 (Retention of Employment), DM HO4 (Housing Mix and Standards), DM HO6 (Delivering Affordable Housing), DM TP1 (Matching development to transport capacity), DM TP2 (Transport and New Development), DM TP6 (Walking and the Pedestrian Environment), DM TP7 (Cycling), DM TP8 (Off Street Parking – Retention and New Provision), DM DC1 (Design Quality), DM DC2 (Layout and Design of Mixed Use Schemes), DM DC4 (Trees and Landscape), DM DC5 (Neighbourliness, Sunlighting and Daylighting), DM DC6 (Balconies and Upper Floor Terraces).

- The Proposals Map: Online Version (July 2013)



5.3.3 The Site is not specifically designated and lies in a predominantly residential area.

- Supplementary Planning Guidance (SPG) & Statements (SPDs) / Evidence
 - Car Club Strategy SPD
 - Design Quality SPD
 - Front Garden and Other Off-Street Parking Standards SPD
 - Residential Design Standards SPD
 - Residential Development Standards SPD
 - Small and Medium Housing Sites SPD
 - Sustainable Construction Checklist SPD
 - Affordable Housing SPD (Draft) and Affordable Housing SPG
 - Design for Maximum Access SPG
 - Planning Obligations Strategy SPG
 - Recycling for New Developments SPG
 - Security by Design SPG
 - Trees: Landscape Design, Planting and Care SPG
 - Trees: Legislation and Procedure SPG
 - Borough-wide Sustainable Urban Development Study
 - Climate Change Strategy
 - Evidence Base for Carbon Emissions Reduction Policies
 - Financial Viability Assessment
 - Heat Mapping Study
 - Infrastructure Delivery Plan
 - Housing Land Supply
 - Housing Needs Assessment
 - New Housing Survey
 - Employment Land Study
 - Employment Sites and Premises
 - Local Economic Survey
 - Community Infrastructure Lev
 - Annual Monitoring Reports

6.0 MATERIAL PLANNING CONSIDERATIONS

6.0.1 The Applicant has reviewed the inspector's reasons for dismissal and amended the scheme, and provided additional supporting information to address these issues 5.0.

6.0.2 It is important to note that the Inspector accepted that the proposal would result in a tidying up of the Site and that it would give rise to additional homes in a broadly suitable location.

Assessment Against the Appeal Decision

[PINS Reference: APP/L5810/W/15/3133362]

6.1 The Effects of the Proposal on Parking & Highway Safety

6.1.1 Please refer to the supporting Transport Statement prepared by Paul Mew Associates.

i. Car & Cycle Provision

6.1.2 The proposed development has been assessed against the Council's parking car and cycle policy, the allocation of 12 parking spaces for the six dwellings and two spaces for the office unit (14 in total) is above the maximum standard. The level of car parking on the Site has been improved so that there are spare spaces, which will reduce the effect of displacement of cars parked in the surrounding residential area. This will also reduce the demand for additional parking on adjacent roads.

6.1.3 The refuse and serving arrangements are considered adequate.

ii. Highway Safety

- 6.1.4 The Site will be accessed from Kingsway. The actual minimum width of the site access is 2.780 meters (m) (not 2.6m as incorrectly accepted by the Inspector) and this is adequate for all residential and commercial vehicles to service the Site. This is clearly demonstrated by the tracking diagrams shown in the Transport Statement prepared by Paul Mew Associates.
- 6.1.5 As there will be an increase of pedestrians accessing the Site a shared surface is proposed for the access road. This will be painted onto the road surface and will aid pedestrians as the walk up the access road.
- 6.1.6 The Applicant has also agreed to introduce a traffic light system on the access road (as acknowledged by the Planning Inspector). The traffic lights would continuously show a green light on the inbound set of signals. If the sensor detects a vehicle attempting to leave and there are no vehicles attempting to enter the access road the signals automatically switch, allowing the exiting vehicle to leave safely. The introduction of this system should avoid any instances of vehicles having to waiting on Kingsway and thus causing an obstruction. The system going to be used for this site will be through vehicle presence detectors as described above.
- 6.1.7 There will be a small increase in the number of trips with the proposed site, however the maximum vehicle movements will be very small and therefore is seen as having an insignificant impact on the highway. There is also a high variation in the number of trips in and out of the existing site.
- 6.1.8 The revised design, therefore, improves both parking and highway safety issues to an acceptable standard.

iii. Construction Management

6.1.9 An Outline Construction Statement has been produced alongside the supporting Transport Statement prepared by Paul Mew Associates.

6.2 The Effects of the Proposal on the Character of the Area

6.2.1 Please refer to the supporting Design and Access Statement prepared by Brookes Architects.

6.2.2 The overall height of the proposed buildings has been reduced from the dismissed scheme. The proposal is for two terraces of three houses each and the single detached property has been removed. This gives a terrace shorter than the existing adjacent terraces in Kingsway and is an appropriate form of development within this area. There is a clear gap between the terraces.

6.2.3 The reduction in height and width and the break in the terrace is now more intimate and less dominating than the existing houses.

i. Design Quality

6.2.4 The design of the scheme will:

- Be integrated into the existing urban form and the natural and built environments
- Optimise the potential of the site
- Provide visually attractive development as a result of good architecture and appropriate landscaping

- 6.2.5 All schemes are expected to be of a high standard of design that is compatible with the scale and character of existing development. Development Management Plan DPD Policy DM DC 1 that the Council will take into account the following factors in considering applications: scale, layout and access arrangements, and relationship to existing townscape in terms of height, form, frontage, building materials, colour and detailing.
- 6.2.6 The design of the scheme responds to local character, reflecting the identity of local surroundings and materials. It reinforces local distinctiveness.
- 6.2.7 It is considered that the existing Site is something of an eyesore and provides a negative visual impact. At present, the Site is fairly open, comprising single-storey structures and areas of hard standing and affording views across the railway to houses on the other side. Nevertheless, the Site itself is not an attractive one in its current use and does not make a positive contribution to the street scene.
- 6.2.8 The scheme would have some benefits in streetscape terms by removing the garages.
- 6.2.9 The scale of neighbouring development is mainly modest two-storey (with roof accommodation) dwelling houses, although a three-storey buildings exist to the west of the Site, fronting onto Clifford Avenue. However, this Site presents a different setting from the surrounding area and should not be taken as a precedent for the scale of development for this Site. The scheme involves construction of six two-storey terraces with private amenity space. The terrace form is consistent with the grain of neighbouring development and there are other dwellings in the vicinity with roof extensions. The design of the proposal is contemporary in an area of more traditional vernacular dwellings but consider the Site provides an opportunity for a distinctive scheme that complements existing development.

6.2.10 Council policy (Development Management Plan Policy DM DC 1) is intended to encourage site specific design responses, for both building and landscape proposals, not to restrict design freedom. The Council does not wish to encourage a particular architectural style or approach but expects each scheme to be justified as a result of a sound understanding of the site and its context.

6.2.11 The buildings have been designed to give the appearance of two-storey dwellings, in keeping with the general scale of development on Clifford Avenue, Kingsway and other neighbouring roads.

ii. Visual Impact & Setting

6.2.12 In terms of outlook the proposal provides an opportunity to improve the visual appearance of the Site, removing the unsightly garages and replacing them with a contemporary designed scheme that fits in with the surroundings in terms of scale, height and proportions, interspersed with landscaped courtyard gardens.

6.2.13 The scale perceived from Kingsway and Clifford Avenue signifies residential use that integrates seamlessly into the surrounding area and sub-conscious expectation. The scheme has been carefully designed to ensure minimum disruption to the local area.

6.2.14 It should be acknowledged that the physical character and amount of development has changed the area in recent years through the driving force of regeneration. This investment has produced an attractive environment, none of which was possible in the area's historic heyday. This is an important point as the character of the area, while having important historic references, is not a re-creation of those earlier times.

iii. Materials & Planting

6.2.15 The design of the proposal is contemporary in an area of more traditional vernacular dwellings but we consider the Site provides an opportunity for a distinctive scheme that complements existing development. The materials will be of high quality and form a restrained and carefully considered palette. Light coloured render will be implemented on the protruding element of the front façade, with the remainder being brick. The modest nature of the scheme will allow the buildings to fit in well with their surroundings. Overall, the development will enhance the current residential character and quality of the area.

6.2.16 The scheme shows an indicative planting scheme. The communal area will include trees and hedges screening refuse / recycling facilities and softening the appearance of the proposal. We also propose to screen the rear boundary of properties with a brick wall and trees in order to help mitigate the noise of the rail line, and provide a level of security. The terraces will also be screened to protect privacy and overlooking.

6.2.17 As required by Development Management DPD Policy DM DC 1 and the Design Quality SPD, the materials, planting and the overall finishing of soft and hard landscaping will be of high quality.

6.3 The Effects of the Proposal on the Living Conditions of Neighbours & Future Residents

6.3.1 Please refer to the supporting Design and Access Statement prepared by Brookes Architects.

i. Housing Mix & Standards

6.3.2 The standards set in the Government's Technical housing standards - national described space standards (March 2015) have been addressed and thus ensure a reasonable standard of accommodation is provided. The proposed units would generally be of a good overall size and form, acceptable layout and would benefit from good levels of light, outlook and privacy.

ii. Amenity Space Provision

6.3.3 All of the two bedroomed houses now have terraces at roof level with a minimum area of 42m². These will be shielded from the noise and disturbance of the railway line and will be far enough away from the neighbouring gardens in Kingsway so as to not provide an overlooking problem.

6.3.4 The three bedroomed houses have a roof terrace with a minimum size of 55m² and, in addition, have a garden at ground floor level in a traditional form, shielded from the railway line by boundary walls, therefore providing a minimum of 70m² amenity space which is in excess of the Council's standards.

6.3.5 All of this amenity space is now considered usable.

iii. Accessibility & Inclusivity

6.3.6 The proposed development will be designed to be an inclusive and welcoming building(s) accessible to all. All of the facilities will be an exemplar of accessibility, fully compliant with all relevant legislative requirements, and therefore maximising opportunities for everyone to benefit.

6.3.7 The proposed development will provide a safe and secure environment for both the residents and visitors. As with any scheme there are a variety of potential security risks, and it is necessary to ensure that security measures are proportional and have regard to the requirement for the Site to be publicly accessible and inviting. In brief, external security will be achieved primarily through vehicle management, access control and a robust building façade.

iv. Lifetime Home Standards & Wheelchair Accessibility

6.3.8 Core Strategy Policy DPD CP14 states that all new homes should be built to Lifetime Homes Standards and 10% of all new housing should be to wheelchair standards. All the units will meet the Lifetime Homes Standards and Unit 7 has been designed to be wheelchair accessible (as shown on the plans).

6.3.9 The roof terraces are well designed, and will receive direct sunlight and will provide sufficient depth to allow access and circulation for a wheelchair. With regards to overlooking, we have included screens on all roof terraces and there will be no privacy issue between the proposed units, as required by Development Management Plan DPD Policy DM DC5.

v. Neighbourliness, Sunlighting & Daylighting

6.3.10 In relation to the effects on neighbouring residents, the Inspector was satisfied that the proposed terrace would be sufficiently far from the gardens of houses on Kingsway so that privacy would not be unreasonably affected.

6.3.11 However, the proposed unit 1 with which the Inspector had some concern has now been omitted in its entirety.

6.4 Affordable Housing

6.4.1 The Applicant has submitted a Viability Assessment to support their case.

6.4.2 The proposal results in the creation of six residential dwellings, and this therefore falls within the remit of Policy DM HO6, which requires a provision for affordable housing, either in kind or as a contribution into the Council's Affordable Housing Fund. As the Site is unlikely to be of interest to a housing association, a contribution is acceptable based on the principle set out in Development Management Plan Policy DM HO6 of capturing the subsidy that a developer would have put in, had the scheme been for affordable housing. This is set out in the Affordable Housing SPD. The policy contribution sought is discounted to represent 30% affordable housing, given the proposal creates six units.

Other Material Considerations

6.5 Demolition

6.5.1 The existing garages on the Site are not of any merit that would justify their retention, or that it can be considered a positive attribute to the surrounding area. We consider that the circumstances of this case, particularly the mixed-use (predominantly residential) benefits that would accrue from the value to be derived from the proposed development, could in any event be seen as overriding.

6.6 Land Uses

i. Loss of Garages

6.6.1 Please refer to the supporting Transport Statement prepared by Paul Mew Associates for details.

6.6.2 The Council has 'in principle' accepted the loss of the garages following detailed Pre-Application Consultation discussions. An analysis of the 'benefits' of the scheme are set out in the subsequent sections of this Statement.

6.6.3 All the garages are below the Council's minimum standard of 5.5 metres (m) by 2.7m.

6.6.4 The level of car parking on the Site has been improved so that there are spare spaces, which will reduce the effect of displacement of cars parked in the surrounding residential area. This will also reduce the demand for additional parking on adjacent roads

6.6.5 It is considered that the proposed loss of the garages would not result in a demonstrable harm to parking in the locality, compliant with Policy DM TP 8 of the Development Management Plan DPD.

ii. Employment Use

6.6.6 Council policy (Development Management Plan DOD Policy DM EM 2) requires sites that were last used for employment purposes to remain in employment use providing they are compatible with the amenity of the surrounding area and access to the site is adequate. Re-use for B1 is considered acceptable in a residential area. In a mixed-use scheme, it is expected that the amount of employment floor space should be maintained or increased.

6.6.7 The car vehicle repair garage has an area of approximately 155 square metres and is positioned at the western end of the Site. It is operated by a mechanic on a part-time basis, who carries out a range of car repairs (totalling five employees).

6.6.8 The existing level of employment space is being re-provided within the proposed scheme. The proposal includes two commercial units totalling approximately 152 square metres, which provides a suitable replacement of employment space within the Site. Two parking spaces (one each) in line with planning policy. There is also space within each office unit to store bikes. The proposed use is a more appropriate use in this residential area than the existing car repair garage and will make a more efficient use of the Site. The proposal, therefore, accords with policies Core Strategy DPD Policy CP19 and Development Management DPD Policy DM EM 2.

6.6.9 This approach is consistent with that taken in other cases where loss of existing employment floorspace has been accepted in return for its replacement with better quality floorspace which provides modern facilities able to be used in a more efficient manner. Examples of this are provided by planning permission 07/3594/FUL in respect of 56-58 Glenthams Road, Barnes and planning permission granted on appeal 10/1484/FUL in respect of 42-44 Charles Street, SW13.

iii. Principle of Residential Use

6.6.10 The Site falls within a predominantly residential area. The proposal would complement the character of the area and will provide a scheme in line with national planning policy objectives and Development Plan policy.

6.6.11 The Site is previously developed land, and the proposal will efficiently and effectively re-use the Site. Therefore, the proposal is supported by the sustainable development principles of the National Planning Policy Framework, and the Core Strategy DPD target that states that 95% of new housing should be built on Brownfield land and emerging government policy that places a presumption in favour of sustainable development.

6.6.12 Core Strategy DPD Policy CP14 states that: *“The density of residential proposals should take into account the need to achieve the maximum intensity of use compatible with local context, while respecting the quality, character and amenity of established neighbourhoods and environmental and ecological policies”*.

6.6.13 The proposed development, comprising of six residential units for young professional or those wishing to downsize, would meet these objectives as the Site lies within an established residential area, is of a comparable scale with the neighbouring development and is in reasonable proximity to amenities and public transport.

6.7 Density

- 6.7.1 The Site is located in a suburban location and has a Public Transport Accessibility Level rating (PTAL) of 2 (entrance to Kingsway) / 3 being close to a train station and bus routes. The expected density range is between 150- 250hr/ha according to the Density Matrix (Table 3.2) set out in the London Plan.
- 6.7.2 Core Strategy DPD Policy CP14D states that density of residential proposals should take into account the need to achieve the maximum intensity of use compatible with the local context, while respecting the quality, character and amenity of the neighbourhood.
- 6.7.3 The density and mix of the scheme has been design-led, determined by the nature of the Site and the scale, form and character of the surrounding area, and in particular its relationship to neighbouring properties. This approach is supported by Core Strategy DPD Policy CP14D. The density of the development proposed complies with these policies.

6.8 Housing Need

- 6.8.1 Core Strategy DPD Policy CP14 sets out the housing targets for the Borough, as established by the London Plan. The minimum strategic dwelling requirement is an additional 2,700 dwellings in the period 2007 to 2017 and an indicative capacity in the range of 150-330 dwellings per year in the ten year period from 2017. Specifically in the 'East Sheen' sub-region, including Barnes and Mortlake, an additional 300 units are required by Policy CP14 in the period up to 2017. These targets have since been updated in the London Plan that stresses that the LPA should seek to achieve and exceed the annual average housing target which is set at 315 dwellings per year for the period up to 2025.

6.8.2 The scheme provides six additional dwellings that will help achieve the Council's housing requirements and is, therefore, strongly supported by Core Strategy DPD policy CP14 and national planning policy guidance.

6.9 Crime Prevention

6.9.1 The garages are not lit at night, and have created an unsafe atmosphere, resulting in complaints made to the site owner regarding anti-social behaviour. Given the location and risks associated with being adjacent to a railway line, this is particularly concerning.

6.9.2 The design, layout and use of the proposal will provide for public safety, deter crime and reduce the fear of crime, helped by the residential units introducing an element of natural surveillance onto the street. Low level street lighting will also be incorporated.

6.10 Noise & Vibration

6.10.1 Please refer to the supporting Noise Impact Assessment prepared by Sustainable Acoustics.

6.10.2 Measured vibration dose values (VDV) were found to be below the threshold where there exists a low probability of adverse comment, and so groundborne vibration due to the railway is not considered an issue. Predicted levels of maximum structure borne noise due to passing trains at night indicated that they may exceed the threshold of 45 dB LAmax.

6.10.3 In conclusion it is considered that the development can achieve recommended levels of internal noise and vibration, provided that a scheme of mitigation is adhered to.

6.11 Sustainable Construction

- 6.11.1 Please refer to the supporting Energy Strategy Report prepared by Syntegra Group.
- 6.11.2 Relevant spatial policies include Core Strategy DPD Policies CP 1 and 2; Development Management Plan DPD Policy DM SD1 focuses on sustainable construction. It states that all development in terms of materials, design, landscaping, standard of construction and operation should include measures capable of mitigating and adapting to climate change to meet future needs. New buildings should conform to the Sustainable Construction Checklist. Following the Government's Ministerial Statement released on 25 March 2015 in response to the Housing Standards Review Consultation, a number of changes have been introduced to technical housing standards in England, including the withdrawal of the Code for Sustainable Homes as a national standard. There are, however, some elements of the Code (water and energy efficiency) in our Local Plan that we will continue to apply.
- 6.11.3 From 6 April 2014, the Council and the Mayor of London apply a 35% reduction in carbon dioxide emissions beyond Part L 2013 of the Building Regulations (over building regulations) from onsite or decentralized renewable energy generation unless it can demonstrate that such provision is not feasible.

6.12 Environmental Constraints

i. Contamination

- 6.12.1 Please refer to the supporting Phase 1: Environmental Risk Assessment prepared by RPS Group.
- 6.12.2 The Environmental Health Department at the Council advised that the Site was used for motor repair services until c.1994 (RPS notes that vehicle servicing currently takes place on site). In view of this, further investigation to determine the Site's suitability for use would be required under Part 2A of the Environmental Protection Act 1990, should the site be proposed for a more sensitive end use.
- 6.12.3 There is the potential for a degree of contamination to exist beneath the west of the Site associated with the current and historical vehicle servicing / repair and the current metal and wood cutting activities as well as other historical potentially contaminative land uses.
- 6.12.4 The area in the west, where the garage and metal / wood cutting activities are present, is proposed for a commercial end use and therefore the vulnerability and sensitivity of these units is considered to be reduced. However, the remainder of the Site is proposed for a residential end use with landscaped areas and communal gardens. This will increase the sensitivity of the Site and future site residents are considered to be potential receptors to any contamination (if present).
- 6.12.5 Furthermore, the Council's Environmental Health Officer advised that given the use of the Site for motor repair services, further investigation would be required should the Site be converted to a sensitive end use.

- 6.12.6 In view of the proposed change of the site to include sensitive end uses, and the potential for contamination to exist beneath the west of the Site, further work is considered necessary to determine the site's suitability for its proposed use (notably in the west of the Site).
- 6.12.7 On the basis of the potential for significant contamination to exist beneath the west of the site, RPS recommends undertaking a localised intrusive environmental ground investigation to establish the nature, extent and implications of any ground contamination beneath the west of the Site. Scope to be confirmed with the Local Authority Environmental Health Officer prior to works commencing.
- 6.12.8 It is envisaged that the above works would be completed under a condition attached to any planning approval granted for the proposed redevelopment of the Site.

ii. Ecology

- 6.12.9 Policy CP4 of the Core Strategy DPD and Development Management Plan DPD DM OS5 requires new development to preserve and where possible enhance existing habitats including biodiversity features.
- 6.12.10 The Site does not form part of any statutory or non-statutory designated nature conservation site. The existing Site is considered to have little biodiversity value as it is entirely covered by garages and concrete.
- 6.12.11 The change of use itself is not considered to be prejudicial to the ecological value of the neighbouring common. While concern could be expressed about the impact of light pollution and noise from residential windows overlooking the common, such noise and light could equally be generated from the existing use.

iii. Archaeology

6.12.12 The Site is identified within the Development Management Plan DPD as being located within an Archaeological Priority Area. Policy DM HD 4 of the DPD seeks to protect, enhance and promote the LPA's archaeological heritage. It is envisaged that archaeological works would be completed under a condition attached to any planning approval granted for the proposed redevelopment of the Site.

iv. Trees & Landscaping

Trees

6.12.13 Please refer to supporting Arboricultural Report and Impact Assessment prepared by Crown Consultants.

6.12.14 Development Management Plan DPD Policy DM DC4 requires landscape proposals for new development to retain existing trees and important landscape features where practicable and include new trees and other planting. The policy requires replacement planting where trees are removed.

6.12.15 The Site is currently completely covered by a hard surface and the proposed scheme will incorporate tree provision and provide significant value. All the trees surveyed are located off-site.

6.12.16 The table below summarises the potential impact on trees due to various activities.

Activity	Trees Potentially Affected
Tree Removal: Retention Category A	None
Tree Removal: Retention Category B	None
Tree Removal: Retention Category C	None
Tree Removal: Retention Category U	None
Tree Pruning	G1, T2, T3, G5
RPA: Foundations	None
RPA: New Surface	None
RPA: Underground Services	None
RPA: Change of Ground Levels	None
RPA: Soil Compaction	None

6.12.17 Other potentially damaging activities often associated with construction sites include demolition or the careless use of plant machinery, hazardous materials, or fires.

6.12.18 It is proposed to prune back the branches trees within G1, T2, T3 and G5 that are growing towards the proposal in order to create a clearance distance of 1.5m. We understand that a party wall agreement is planned which will include such a right of access and pruning over land immediately adjacent to the site.

6.12.19 Such pruning shall require the removal of relatively small secondary branches which should be pruned back to a secondary growth point.

6.12.20 Such a small amount of pruning shall have no impact on local visual amenity and is not considered to be a material planning consideration.

6.12.21 All other tree canopies shall be unaffected by the proposals.

Landscape

6.12.22 While subject to condition, the landscaping proposals retain an air of formality to complement the proposed residential and commercial units whilst introducing planting to support its purpose as communal space.

6.12.23 The divisions between residential and commercial will be created by a yew hedge and shrub planting. By reason of the subdivision being articulated as part of the formal layout of landscaping, the visual impact will preserve the character and appearance of the surrounding area and its setting and is therefore acceptable.

v. Flooding & Sustainable Drainage

6.12.24 Please refer to the supporting Flood Risk Assessment prepared by RAB Consultants.

6.12.25 Development Management Plan DPD Policy DM DC7 requires development to follow the drainage hierarchy when disposing of surface water and to utilise Sustainable Drainage Systems wherever practical. Further details on how groundwater will be managed are recommended to be secured by condition.

6.12.26 The Site is located within Flood Zone 2 (medium probability flooding) as described in the National Planning Policy Framework (NPPF). The NPPF requires a Flood Risk Assessment (FRAs) to be carried out to ensure flood risk to the proposed development is considered as well as the impact the development will have elsewhere on people and property.

6.12.27 The existing understanding of the fluvial flood risk at the site is based on the Environment Agency (EA) detailed flood risk data (Appendix B of the supporting FRA). The EA provided modelled flood levels along with breach modelling results in respect of the River Thames. The conclusion is that the Site is not at risk of tidal flooding from the River Thames both now and in the future due to the presence of the defences and not at risk from a failure of the defences. This FRA also demonstrates that the Site is at low risk of flooding from all other sources.

6.12.28 Flood resistant construction techniques should be employed to ensure that the proposed basement is safe from flooding and damp. Furthermore, this report suggests and encourages the employment of Sustainable Drainage Systems (SuDS) for the management of surface water runoff within the site as a result of the increase in impermeable area.

6.12.29 In conclusion, the proposed development will be safe for its design life and will not increase flood risk elsewhere.

6.13 Planning Obligations

6.13.1 Core Strategy policies CP16 and CP18 set the basis for the creation of sustainable communities. Commensurate with the scale of development and as mitigation, a financial contribution is required for the provision of improvements towards education, health, the public realm/open space and transport.

6.13.2 The Applicant would enter into discussions with the Council on the appropriate planning obligations necessary to mitigate the impact of the proposed development.

6.14 Community Engagement

6.14.1 Following on from Section 3.3 of this Statement, the following exercises / tools were undertaken as part of the Public Consultation process (**Appendix 3** of this Statement):

- Circulation, via mail shot and e-mail, of a Public Consultation Leaflet to local residents along Kingsway, immediately adjacent to the Site, on 9 January 2014 and ward Councillors. Ward Councillors and Planning Officer's at the Council were invited

- A local Public Consultation Exhibition was undertaken on Wednesday 14 January 2015 with boards displayed. The Project Architects, Planning Agent, and Transport Consultant were in attendance to present the scheme and answer any comments / queries raised

7.0 CONCLUSIONS

7.1 Conclusions

- 7.1.1 The Inspector accepted that the proposal would result in a tidying up of the site and that it would give rise to additional homes in a broadly suitable location.
- 7.1.2 It is considered that the shortcomings of the appeal scheme have now been addressed.
- 7.1.3 The aim of this proposal is to create a new development to a revised design consisting of only six residential units, two commercial units and relevant parking, bin storage, amenity space and bicycle storage. Its appearance and scale have been carefully considered to ensure that it will not have a detrimental effect on the surrounding properties. This proposal will enhance the local area by addressing the issue of a shortage of small family homes in London with allocated parking and a safe play area for young children. Furthermore, the neighbouring properties will benefit from the regeneration of a poorly maintained and secluded area into a low rise scheme that is appropriate for the context in which it has been designed. The proposal will also retain the minor employment services on the site through the conversion of the arches.
- 7.1.4 The proposal will be of an appropriate scale and we believe that it will both preserve and enhance the local area.
- 7.1.5 On the basis of the above, we strongly commend the proposals to the Council.



PLANNING STATEMENT

In Respect Of:

**KINGSWAY MEWS,
REAR OF 127-147
KINGSWAY, MORTLAKE,
SW14 7HN**

With Regard To:

**AMENDED SCHEME:
DEMOLITION OF 38
GARAGES & ERECTION OF
SIX RESIDENTIAL UNITS &
TWO COMMERCIAL (B1A)
UNITS INCLUDING
ASSOCIATED WORKS**

On Behalf Of:


**SPACE SOLUTIONS UK
LIMITED**

JLA Ref: **JL/PB/223**
Date: **APRIL 2016**

Quality Control

All documents, material, or other information prepared by James Lloyd Associates Limited are subject to standard quality control procedures that must be signed by the James Lloyd Associates Principal. Documents without a signature have not been subjected to Quality Control procedures and should be treated as draft only. No responsibility or liability is accepted for the consequences of any document accepted or used by the Client or any other party that is not compliant with these procedures.

Approver:

.....  James Lloyd Associates Principal

Report: FINAL

Date: 13 April 2016

Copyright

The contents of this document must not be copied or reproduced in whole or in part without the written consent of James Lloyd Associates Limited.

CONTENTS	PAGE(S)
1.0 INTRODUCTION	5
1.1 Introduction	5
1.2 Background & Objectives	6
1.3 Summary of Main Planning Issues	7
1.4 Structure of Statement	8
2.0 SITE DETAILS	10
2.1 Site Description	10
2.2 Context	12
3.0 PLANNING HISTORY & EVOLUTION OF THE SCHEME	17
3.1 Planning History	17
3.2 Case Examples – Planning History	17
3.3 Evolution of the Scheme	18
4.0 PROPOSED DEVELOPMENT	20
4.1 Description of Proposed Development	20
4.2 Applicant Requirements	22
5.0 RELEVANT PLANNING POLICY	23
5.1 Determining Applications for Permission	23
5.2 National Policy	23
5.3 Development Plan	24
6.0 MATERIAL PLANNING CONSIDERATIONS	27
<u>Assessment Against the Appeal Decision</u>	
6.1 The Effect of the Proposal on Parking & Highway Safety	27
6.2 The Effect of the Proposal on the Character of the Area	29
6.3 The Effect of the Proposal on the Living Conditions of Neighbours & Future Residents	33
6.4 Affordable Housing	35
<u>Other Material Considerations</u>	
6.5 Demolition	36
6.6 Land Uses	36
6.7 Density	39
6.8 Housing Need	39
6.9 Crime Prevention	40
6.10 Noise & Vibration	40

6.11	Sustainable Construction	41
6.12	Environmental Constraints	42
6.13	Planning Obligations	47
6.14	Community Engagement	48
7.0	CONCLUSIONS	49
7.1	Conclusions	49

APPENDICES

1. **LBRuT Pre-Application Written Response dated 7 November 2014**

2. **Case Examples (Officer's Report, Decision Notice etc.):**
 - i. **198-200 Armyard Park Road, Twickenham (08/3078/FUL) – Granted on 22 February 201**
 - ii. **31-35 Railway Road, Teddington (08/3314/FUL) – Granted 29 on March 2010**
 - iii. **54-76 Shacklegate Lane, Teddington (08/3355/FUL) – Granted on 29 March 2010**
 - iv. **92-102 Sherland Road, Twickenham (08/4195/FUL) – Granted on 6 May 2010**
 - v. **42-44 Charles Street, Barnes (10/1484/FUL) – Non-Determination: Refusal. Allowed on appeal on 1 March 2011**

3. **Public Consultation**
 - i. **Exchanges of Correspondence**
 - ii. **Leaflets and Boards**
 - iii. **Public Consultation Photographs**
 - iv. **Resident Written Responses**

1.0 INTRODUCTION

1.1 Introduction

1.1.1 This Planning Statement (hereafter referred to as the 'Statement') has been prepared by James Lloyd Associates Limited in support of a proposal for mixed-use (residential and commercial) development, submitted on behalf of Space Solutions UK Limited (hereafter referred to as the 'Applicant'), with regard to Kingsway Mews, Rear of 127-147 Kingsway, Mortlake, SW14 7HN (hereafter referred to as the 'Site').

1.1.2 This Amended Full Planning Application (hereafter referred to as the 'Application') seeks consent from the London Borough of Richmond upon Thames (hereafter referred to the 'Council') for the:

"Demolition of 38 garages including vehicle repair garage and the erection of six residential units (2x 3 bed and 4 x 2 bed), incorporating two commercial (B1a offices) units (totalling 152 sq.m), with amenity space, off-street car parking and associated works."

1.1.3 The original scheme for seven units (FP Application No. 15/0278/FUL / PINS Reference: APP/L5810/W/15/3133362) was dismissed at appeal following non-determination. The Inspector considered the following issues:

1. The effects of the proposal on parking and highway safety
2. The effects of the proposal on the character of the area
3. The effects of the proposal on the living conditions of neighbours and future residents
4. Whether the proposal should contribute to the provision of affordable housing

- 1.1.4 The Applicant has reviewed the inspector's reasons for dismissal and amended the scheme and provided additional supporting information to address these issues.
- 1.1.5 The scheme will consist of six houses and two commercial units. Four of the residential units will be two bedroomed houses and two will be three bedroomed houses. These houses will comprise ground and first floor levels. Each will have a private roof terrace. The commercial units will be housed within the existing bridge arches, complete with a contemporary glazed entrance extension. There will be a total of 14 car parking spaces, including one disabled.
- 1.1.6 It is important to note that the Inspector accepted that the proposal would result in a tidying up of the site and that it would give rise to additional homes in a broadly suitable location.

1.2 Background & Objectives

i. Background

- 1.2.1 The Applicant is the freeholder of the Site who wishes to redevelop the Site due to its physical and historical constraints, which is expanded upon within this Statement.
- 1.2.2 Where other developers are postponing development, the Applicant is keen to proceed with the scheme on the Site without delay, given the costs involved.

ii. Objectives

1.2.3 The proposed development is intended to achieve the important planning aims of regeneration and sustainable development, arising out of the Site's particular characteristics and accessible location, together with the existing planning policy context. The main objectives of the proposed development are:

- To enhance and improve the Site by sensitive redevelopment
- The effective and efficient use of the Site
- Removal of redundant and unattractive structures
- Provision of housing (family dwellings) that meets local demand and commercial (B1) floorspace

1.3 Summary of Main Planning Issues

1.3.1 In light of the appeal decision, we consider the main planning considerations to be:

- The effects of the proposal on parking and highway safety
- The effects of the proposal on the character of the area
- The effects on the living conditions of neighbours and future residents
- Whether the proposal should contribute to the provision of affordable housing

1.4 Structure of Statement

1.4.1 Section 2.0 describes the Site and its context; Section 3.0 sets out the planning history of the Site; Section 4.0 describes the proposed development; Section 5.0 sets out the relevant national, regional and local planning policy, and supporting planning policy guidance; Section 6.0 assesses the proposed development against the planning policy documents identified in Section 5.0. Conclusions are drawn in Section 7.0.

1.4.2 The purpose of this Statement is to draw out the key planning issues arising from the development proposals and to assess the proposals in light of the national, regional, and local planning policy. This Statement will demonstrate that the scheme accords with these policies.

1.4.3 In addition to this Statement, the proposed development should be read in conjunction with the following documents (in no particular order):

- Covering Letter and Forms / Planning Statement prepared by JLA Limited
- Design and Access Statement including Drawings prepared by Brookes Architects:
 - 4594_03_001 - Site Location Plan
 - 4594_03_002 - Topographical Survey
 - 4594_03_003 - Proposed Site Plan
 - 4594_03_004 - Proposed Ground Floor
 - 4594_03_005 - Proposed First Floor
 - 4594_03_006 - Proposed Roof Terrace
 - 4594_03_007 – Proposed Elevations
 - 4594_03_008 – Proposed Sections
 - 4594_03_009 - Proposed Elevations Bin and Bike Store

- Noise Impact Assessment prepared by Sustainable Acoustics
- Transport Statement including Parking Survey prepared by Paul Mew Associates
- Arboricultural Report and Impact Assessment prepared by Crown Consultants
- Energy Strategy Report prepared Syntegra Consulting
- Daylight, Sunlight and Overshadowing Report prepared by Syntegra Consulting
- Phase 1: Environmental Risk Assessment prepared by RPS Group
- Flood Risk Assessment prepared by RAB Consultants
- Appeal Decision APP-L5810-W-15-3133362

1.4.4 This Statement draws upon the conclusion of these documents, as necessary.

2.0 SITE DETAILS

2.1 Site Description

2.1.1 Please refer to the supporting Design and Access Statement prepared by Brookes Architects.

2.1.2 The Site is approximately 0.14ha in size. It consists mainly of lock up garages with a combined Gross Internal Area (GIA) of approximately 5,800 square feet (sq.ft) / 539 square metres (sq.m). It also contains a single-storey vehicle repair garage of approximately 1,670 sq.ft / 155 sq.m GIA housed within the arches of the adjacent bridge. A metal canopy extends the coverage of the vehicle repair garage approximately 5.5 metres out from the bridge, with the remainder of the Site covered in hard paving.

Site Photograph - The Site Looking Towards the Bridge



Site Photograph - The Lock up Garages which Back onto the Boundary with the Railway



Site Photographs - The Lock Up Garages & The Vehicle Repair Garage



2.1.3 The Site is set back from Kingsway and is accessed through an access road approximately 3 metres (m) wide and 40m long between houses Nos.127 and 129 Kingsway. The rear gardens of Nos. 127 to 145 Kingsway bound the Site to the north and east. The southern boundary is adjacent to the railway line and the western boundary is adjacent to the Clifford Avenue Bridge that is part of the A205 South Circular Road. The arches under the bridge are occupied by the vehicle repair garage. The Site is not visible from the public footpath (Kingsway).

2.1.4 The existing entrance (accessed from Kingsway) is bound by the front garden walls of Nos. 127 and 129 Kingsway.

2.2 Context

2.2.1 Generally, the wider character of the area is predominantly residential. Currently, the southern boundary of the Site comprises a chain link fence. Beyond this is the railway track separated from the Site by overgrown shrubbery.

2.2.2 The bridge bounding the Site to the west is constructed from good quality brick. However, its appearance is hampered by the unsympathetic metal canopy of the vehicle repair garage which obstructs the view of the archways.

2.2.3 While the area is not in a designated Conservation Area, it could be argued that the general condition and appearance of the lock up garages detract from the nearby residential character of the area.

Aerial View of the Site & Surrounding Area (Indicative Red Line Boundary)



Source: Bing Maps (April 2016)

i. Heritage Assets

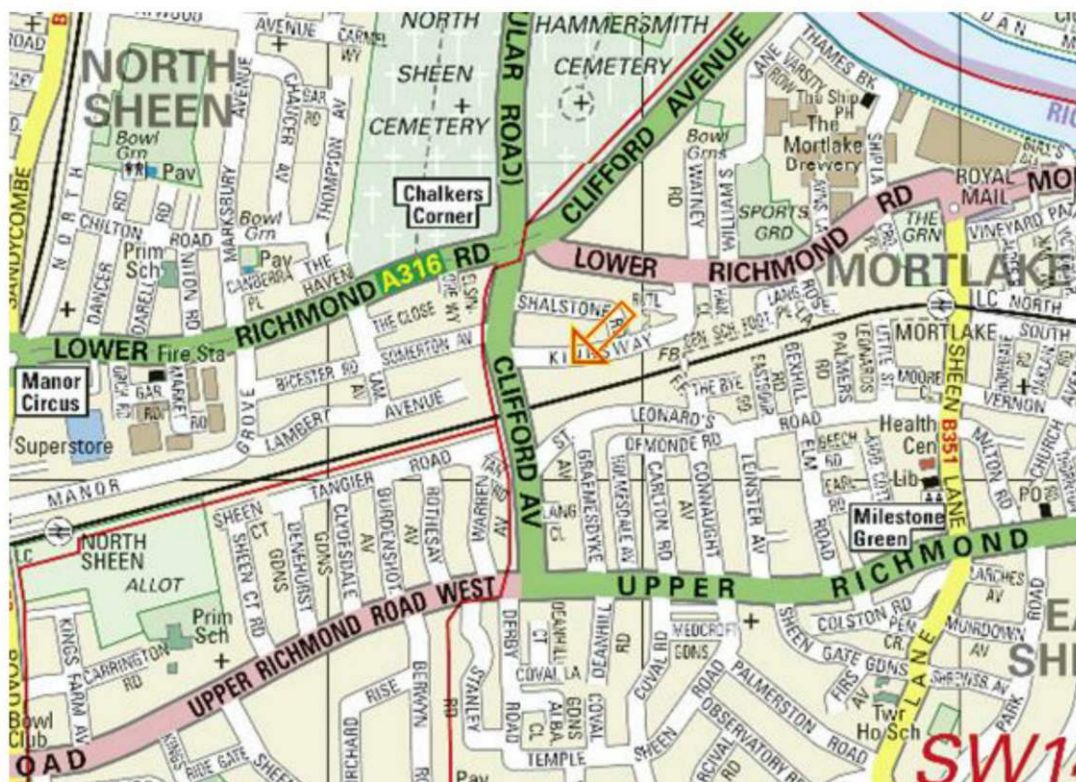
2.2.4 The Site is not designated within a Conservation Area. None of the structures, themselves, are statutorily or locally listed with no adjoining listed buildings.

ii. Transport & Accessibility

2.2.5 Please refer to the supporting Transport Statement prepared by Paul Mew Associates for details.

2.2.6 The Site has a Public Transport Accessibility Level rating of 2 (entrance to Kingsways) / 3, which is poor / moderate (TfL Planning Information Database). The Site is not located in a Controlled Parking Zone.

Street Map



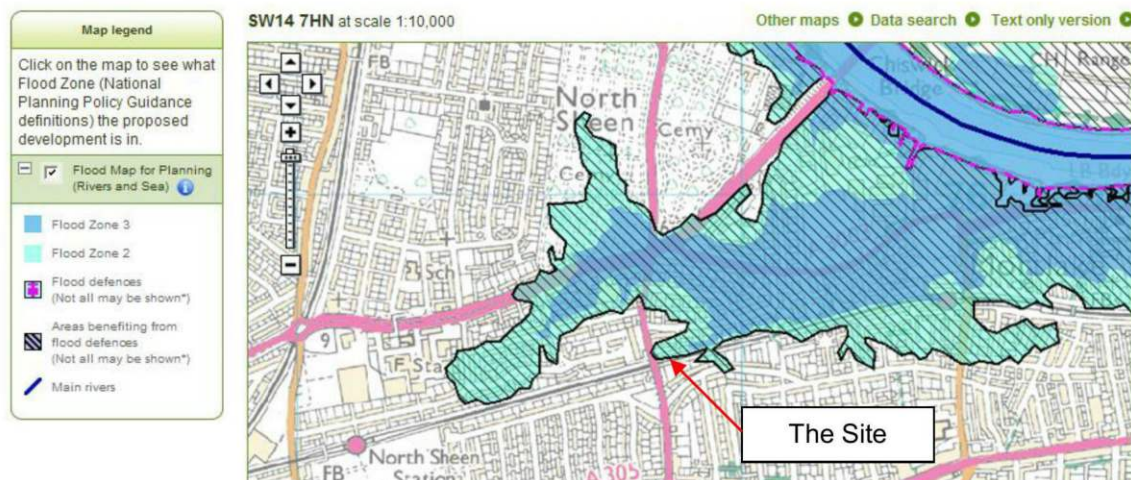
Source: Street Map (April 2016)

2.2.7 The area benefits from good communication links with the A316. North Sheen Railway Station is approximately 900 metres walking distance, which provides a regular commuter service to Central London. There are also numerous bus stops.

iii. Flood Risk

2.2.8 Please refer the supporting Flood Risk Assessment prepared by RAB Consultants.

Environment Agency – Flood Risk Map



Source: Environment Agency (April 2016)

2.2.9 The Site is located to the south of the River Thames and is in a Flood Risk Zone. Flood Zone definitions are set out in the National Planning Policy Guidance:

- Flood Zone 1 - land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%)

- Flood Zone 2 - land assessed as having between a 1 in 100 and 1 in 1,000 annual probability of river flooding (1% – 0.1%), or between a 1 in 200 and 1 in 1,000 annual probability of sea flooding (0.5% – 0.1%) in any year
- Flood Zone 3 - land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%), or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%) in any year

iv. Environmental Constraints

2.2.10 Please refer to the supporting Phase 1: Environmental Risk Assessment prepared by RPS Group.

2.2.11 The Site comprised open land from at least 1850 and by c.1913 a bridge associated with Clifford Avenue (road) had been constructed over the far west of the Site. By c.1933 likely domestic garages were present on the site and by c.1974 additional buildings (likely domestic garages) had been constructed. The Environmental Health Officer at the Council advised that the Site has been used for motor repair services. Planning information indicates that the railway arches in the west of the Site have been used as for storage and industrial purposes and as workshops

3.0 PLANNING HISTORY & EVOLUTION OF THE SCHEME

3.1 Planning History

3.1.1 A planning history search of the Site has been undertaken by making use of the online property search engine on the Council's website. There are none listed.

3.1.2 It is considered that the current use class of the Site, as garages and vehicle repair garage, is Sui Generis / B1c (light industrial) of the Town and Country Planning (Use Classes) Order 1987 and its subsequent amendments.

3.2 Case Examples – Planning History

3.2.1 The principle of redeveloping garaging of a similar nature for residential use is established with the Council granting permission for the following schemes (Please refer to **Appendix 2** of this Statement):

- 198-200 Armyard Park Road, Twickenham (08/3078/FUL) – Granted on 22 February 2010
- 31-35 Railway Road, Teddington (08/3314/FUL) – Granted on 29 March 2010
- 54-76 Shacklegate Lane, Teddington (08/3355/FUL) – Granted on 29 March 2010
- 92-102 Sherland Road, Twickenham (08/4195/FUL) – Granted on 6 May 2010

3.2.2 In addition, on 1 March 2011 an application for demolition of garages and redevelopment to provide five residential units and an office at 42-44 Charles Street was allowed on appeal (10/1484/FUL).

3.3 Evolution of the Scheme

i. Pre-Application Consultation – September 2014

- 3.3.1 A Request for Pre-Application Consultation was received by the Council on 16 September 2014 with a meeting taking place on 4 November 2014 with Planning and Design and Conservation Officers in attendance.
- 3.3.2 The Council's Pre-Application Written Response (**Appendix 1** of this Statement) was received via e-mail dated 7 November 2014. The Council has 'in principle' accepted the loss of the garages and proposed mixed-use (residential and commercial) development.
- 3.3.3 Following the Council's Pre-Application Written Response, the mix of residents was altered to provide 3 x 2 bed and 4 x 3 bed residential units with the car parking arrangements / layout altered. The communal amenity area and space between the proposed commercial units was reconfigured to provide a better degree of separation.

ii. Public Consultation – Early January 2015

- 3.3.4 Please refer to **Appendix 3** of this Statement.
- 3.3.5 On Wednesday 14 January 2015 (between 4.30pm to 7.30pm) Public Consultation with local residents, Ward Councillors, and any interested parties was undertaken at The Tapestry, 1 Lower Richmond Road, London, SW14 7EX. 50 Public Consultation Leaflets were mail dropped to residents along Kingsway, immediately adjacent to the Site, on 9 January 2014 and e-mails sent to a number of local residents who responded to the mail shot.

iii. Application Submission – Mid January 2015

- 3.3.6 There have been subsequent exchanges of correspondence between all parties with amendments made to the design in terms of elevation changes, with regard to treatment, and details on the use of materials.
- 3.3.7 It is considered that the Application, as now submitted, addresses all the issues raised by the Council that are assessed in full in Section 6.0 of this Statement.

iv. Planning Appeal – January 2016

- 3.3.8 An appeal was submitted due to the Council's failure to issue a decision within the relevant time-scale. The Council had indicated that it would have refused the application and has given putative reasons for refusal.
- 3.3.9 The Applicant has reviewed the inspector's reasons for dismissal and amended the scheme and provided additional supporting information to address these issues.
- 3.3.10 The scheme will consist of six houses and two commercial units. Four of the residential units will be two bedroomed houses and two will be three bedroomed houses. These houses will comprise ground and first floor levels. Each will have a private roof terrace. The commercial units will be housed within the existing bridge arches, complete with a contemporary glazed entrance extension. There will be a total of 14 car parking spaces, including one disabled.
- 3.3.11 It is important to note that the Inspector accepted that the proposal would result in a tidying up of the site and that it would give rise to additional homes in a broadly suitable location.

4.0 PROPOSED DEVELOPMENT

4.1 Description Proposed Development

4.1.1 This Application seeks consent from the Council for the:

“Demolition of 38 garages including vehicle repair garage and the erection of six residential units (2x 3 bed and 4 x 2 bed), incorporating two commercial (B1a offices) units (totalling 152 sq.m), with amenity space, off-street car parking and associated works.”

Drawing No. 4594_03_001 - Site Location Plan



Drawing No. 4594_03_007 – Proposed Elevations



4.1.2 The scheme will consist of six houses and two commercial units. Four of the residential units will be two bed roomed houses and two will be three bed roomed houses. These houses will comprise ground and first floor levels. Each will have a private roof terrace. The commercial units will be housed within the existing bridge arches, complete with a contemporary glazed entrance extension. There will be a total of 14 car parking spaces, including one disabled.

Area Schedules

Schedule of unit areas (gross internal)

RESIDENTIAL UNITS	METRIC (sq m)
Unit 1	165
Unit 2	127
Unit 3	132
Unit 4	132
Unit 5	127
Unit 6	165
TOTAL	848

COMMERCIAL UNITS	METRIC (sq m)
Office A	76
Office B	76
TOTAL	152

Schedule of Accommodation

UNIT	DESCRIPTION
Unit 1	3 bed, 5 person house
Unit 2	2 bed, 4 person house
Unit 3	2 bed, 4 person house
Unit 4	2 bed, 4 person house
Unit 5	2 bed, 4 person house
Unit 6	3 bed, 5 person house
Office A	N/A
Office B	N/A

Schedule of amenity spaces

USE	METRIC (sq m)
Private (Unit 1)	70
Private (Unit 2)	42
Private (Unit 3)	42
Private (Unit 4)	42
Private (Unit 5)	42
Private (Unit 6)	80
TOTAL	318

Proposed Perspective (View Looking South West towards Clifford Avenue)



4.2 Applicant Requirements

4.2.1 The present condition of the Site detracts from the overall character and appearance of the surrounding area. Consequently, an opportunity has arisen to build a landmark scheme. The Applicant would like to redevelop the Site to maximise its potential, while at the same time re-affirming its architectural character.

5.0 RELEVANT PLANNING POLICY

5.1 Determining Applications for Permission

5.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that when determining a planning application, regard is to be had to the Development Plan, and the determination shall be made in accordance with the plan unless material considerations indicate otherwise.

5.2 National

Department for Communities & Local Government (Published)

- National Planning Policy Framework (March 2012)

5.2.1 At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking (Paragraph 14).

5.2.2 Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.

5.3 Development Plan

i. Regional

Greater London Authority (Published)

- The London Plan: Spatial Development Strategy for Greater London (March 2015)

ii. Local

London Borough of Richmond upon Thames (Adopted)

- Local Development Framework: Core Strategy Development Plan Document (April 2009)

5.3.1 The relevant policies include (but are not limited to): CP1 (Sustainable Development), CP2 (Reducing Carbon Emissions), CP3 (Climate change – Adapting to the Effects), CP4 (Biodiversity), CP5 (Sustainable Travel), CP7 (Maintaining and Improving the Local Environment), CP14 (Housing), CP15 (Affordable Housing), CP17 (Health and Well-being), CP19 (Local Business).

- Local Development Framework: Development Management Plan Development Plan Document (November 2011)

5.3.2 The relevant policies include (but are not limited to): DM SD1 (Sustainable Construction), DM SD2 (Renewable Energy and Decentralised Energy Networks), DM SD3 (Retrofitting), DM SD4 (Adapting to Higher Temperatures and Need for Cooling), DM SD7 (Sustainable Drainage), DM OS5 (Biodiversity and New Development), DM OS7 (Children's and Young People's Play Facilities), DM EM 1 (Development for Offices, Industrial, Storage and Distribution Uses), DM EM 2 (Retention of Employment), DM HO4 (Housing Mix and Standards), DM HO6 (Delivering Affordable Housing), DM TP1 (Matching development to transport capacity), DM TP2 (Transport and New Development), DM TP6 (Walking and the Pedestrian Environment), DM TP7 (Cycling), DM TP8 (Off Street Parking – Retention and New Provision), DM DC1 (Design Quality), DM DC2 (Layout and Design of Mixed Use Schemes), DM DC4 (Trees and Landscape), DM DC5 (Neighbourliness, Sunlighting and Daylighting), DM DC6 (Balconies and Upper Floor Terraces).

- The Proposals Map: Online Version (July 2013)



5.3.3 The Site is not specifically designated and lies in a predominantly residential area.

- Supplementary Planning Guidance (SPG) & Statements (SPDs) / Evidence
 - Car Club Strategy SPD
 - Design Quality SPD
 - Front Garden and Other Off-Street Parking Standards SPD
 - Residential Design Standards SPD
 - Residential Development Standards SPD
 - Small and Medium Housing Sites SPD
 - Sustainable Construction Checklist SPD
 - Affordable Housing SPD (Draft) and Affordable Housing SPG
 - Design for Maximum Access SPG
 - Planning Obligations Strategy SPG
 - Recycling for New Developments SPG
 - Security by Design SPG
 - Trees: Landscape Design, Planting and Care SPG
 - Trees: Legislation and Procedure SPG
 - Borough-wide Sustainable Urban Development Study
 - Climate Change Strategy
 - Evidence Base for Carbon Emissions Reduction Policies
 - Financial Viability Assessment
 - Heat Mapping Study
 - Infrastructure Delivery Plan
 - Housing Land Supply
 - Housing Needs Assessment
 - New Housing Survey
 - Employment Land Study
 - Employment Sites and Premises
 - Local Economic Survey
 - Community Infrastructure Lev
 - Annual Monitoring Reports

6.0 MATERIAL PLANNING CONSIDERATIONS

6.0.1 The Applicant has reviewed the inspector's reasons for dismissal and amended the scheme, and provided additional supporting information to address these issues 5.0.

6.0.2 It is important to note that the Inspector accepted that the proposal would result in a tidying up of the Site and that it would give rise to additional homes in a broadly suitable location.

Assessment Against the Appeal Decision

[PINS Reference: APP/L5810/W/15/3133362]

6.1 The Effects of the Proposal on Parking & Highway Safety

6.1.1 Please refer to the supporting Transport Statement prepared by Paul Mew Associates.

i. Car & Cycle Provision

6.1.2 The proposed development has been assessed against the Council's parking car and cycle policy, the allocation of 12 parking spaces for the six dwellings and two spaces for the office unit (14 in total) is above the maximum standard. The level of car parking on the Site has been improved so that there are spare spaces, which will reduce the effect of displacement of cars parked in the surrounding residential area. This will also reduce the demand for additional parking on adjacent roads.

6.1.3 The refuse and serving arrangements are considered adequate.

ii. Highway Safety

- 6.1.4 The Site will be accessed from Kingsway. The actual minimum width of the site access is 2.780 meters (m) (not 2.6m as incorrectly accepted by the Inspector) and this is adequate for all residential and commercial vehicles to service the Site. This is clearly demonstrated by the tracking diagrams shown in the Transport Statement prepared by Paul Mew Associates.
- 6.1.5 As there will be an increase of pedestrians accessing the Site a shared surface is proposed for the access road. This will be painted onto the road surface and will aid pedestrians as the walk up the access road.
- 6.1.6 The Applicant has also agreed to introduce a traffic light system on the access road (as acknowledged by the Planning Inspector). The traffic lights would continuously show a green light on the inbound set of signals. If the sensor detects a vehicle attempting to leave and there are no vehicles attempting to enter the access road the signals automatically switch, allowing the exiting vehicle to leave safely. The introduction of this system should avoid any instances of vehicles having to waiting on Kingsway and thus causing an obstruction. The system going to be used for this site will be through vehicle presence detectors as described above.
- 6.1.7 There will be a small increase in the number of trips with the proposed site, however the maximum vehicle movements will be very small and therefore is seen as having an insignificant impact on the highway. There is also a high variation in the number of trips in and out of the existing site.
- 6.1.8 The revised design, therefore, improves both parking and highway safety issues to an acceptable standard.

iii. Construction Management

6.1.9 An Outline Construction Statement has been produced alongside the supporting Transport Statement prepared by Paul Mew Associates.

6.2 The Effects of the Proposal on the Character of the Area

6.2.1 Please refer to the supporting Design and Access Statement prepared by Brookes Architects.

6.2.2 The overall height of the proposed buildings has been reduced from the dismissed scheme. The proposal is for two terraces of three houses each and the single detached property has been removed. This gives a terrace shorter than the existing adjacent terraces in Kingsway and is an appropriate form of development within this area. There is a clear gap between the terraces.

6.2.3 The reduction in height and width and the break in the terrace is now more intimate and less dominating than the existing houses.

i. Design Quality

6.2.4 The design of the scheme will:

- Be integrated into the existing urban form and the natural and built environments
- Optimise the potential of the site
- Provide visually attractive development as a result of good architecture and appropriate landscaping

- 6.2.5 All schemes are expected to be of a high standard of design that is compatible with the scale and character of existing development. Development Management Plan DPD Policy DM DC 1 that the Council will take into account the following factors in considering applications: scale, layout and access arrangements, and relationship to existing townscape in terms of height, form, frontage, building materials, colour and detailing.
- 6.2.6 The design of the scheme responds to local character, reflecting the identity of local surroundings and materials. It reinforces local distinctiveness.
- 6.2.7 It is considered that the existing Site is something of an eyesore and provides a negative visual impact. At present, the Site is fairly open, comprising single-storey structures and areas of hard standing and affording views across the railway to houses on the other side. Nevertheless, the Site itself is not an attractive one in its current use and does not make a positive contribution to the street scene.
- 6.2.8 The scheme would have some benefits in streetscape terms by removing the garages.
- 6.2.9 The scale of neighbouring development is mainly modest two-storey (with roof accommodation) dwelling houses, although a three-storey buildings exist to the west of the Site, fronting onto Clifford Avenue. However, this Site presents a different setting from the surrounding area and should not be taken as a precedent for the scale of development for this Site. The scheme involves construction of six two-storey terraces with private amenity space. The terrace form is consistent with the grain of neighbouring development and there are other dwellings in the vicinity with roof extensions. The design of the proposal is contemporary in an area of more traditional vernacular dwellings but consider the Site provides an opportunity for a distinctive scheme that complements existing development.

6.2.10 Council policy (Development Management Plan Policy DM DC 1) is intended to encourage site specific design responses, for both building and landscape proposals, not to restrict design freedom. The Council does not wish to encourage a particular architectural style or approach but expects each scheme to be justified as a result of a sound understanding of the site and its context.

6.2.11 The buildings have been designed to give the appearance of two-storey dwellings, in keeping with the general scale of development on Clifford Avenue, Kingsway and other neighbouring roads.

ii. Visual Impact & Setting

6.2.12 In terms of outlook the proposal provides an opportunity to improve the visual appearance of the Site, removing the unsightly garages and replacing them with a contemporary designed scheme that fits in with the surroundings in terms of scale, height and proportions, interspersed with landscaped courtyard gardens.

6.2.13 The scale perceived from Kingsway and Clifford Avenue signifies residential use that integrates seamlessly into the surrounding area and sub-conscious expectation. The scheme has been carefully designed to ensure minimum disruption to the local area.

6.2.14 It should be acknowledged that the physical character and amount of development has changed the area in recent years through the driving force of regeneration. This investment has produced an attractive environment, none of which was possible in the area's historic heyday. This is an important point as the character of the area, while having important historic references, is not a re-creation of those earlier times.

iii. Materials & Planting

6.2.15 The design of the proposal is contemporary in an area of more traditional vernacular dwellings but we consider the Site provides an opportunity for a distinctive scheme that complements existing development. The materials will be of high quality and form a restrained and carefully considered palette. Light coloured render will be implemented on the protruding element of the front façade, with the remainder being brick. The modest nature of the scheme will allow the buildings to fit in well with their surroundings. Overall, the development will enhance the current residential character and quality of the area.

6.2.16 The scheme shows an indicative planting scheme. The communal area will include trees and hedges screening refuse / recycling facilities and softening the appearance of the proposal. We also propose to screen the rear boundary of properties with a brick wall and trees in order to help mitigate the noise of the rail line, and provide a level of security. The terraces will also be screened to protect privacy and overlooking.

6.2.17 As required by Development Management DPD Policy DM DC 1 and the Design Quality SPD, the materials, planting and the overall finishing of soft and hard landscaping will be of high quality.

6.3 The Effects of the Proposal on the Living Conditions of Neighbours & Future Residents

6.3.1 Please refer to the supporting Design and Access Statement prepared by Brookes Architects.

i. Housing Mix & Standards

6.3.2 The standards set in the Government's Technical housing standards - national described space standards (March 2015) have been addressed and thus ensure a reasonable standard of accommodation is provided. The proposed units would generally be of a good overall size and form, acceptable layout and would benefit from good levels of light, outlook and privacy.

ii. Amenity Space Provision

6.3.3 All of the two bedroomed houses now have terraces at roof level with a minimum area of 42m². These will be shielded from the noise and disturbance of the railway line and will be far enough away from the neighbouring gardens in Kingsway so as to not provide an overlooking problem.

6.3.4 The three bedroomed houses have a roof terrace with a minimum size of 55m² and, in addition, have a garden at ground floor level in a traditional form, shielded from the railway line by boundary walls, therefore providing a minimum of 70m² amenity space which is in excess of the Council's standards.

6.3.5 All of this amenity space is now considered usable.

iii. Accessibility & Inclusivity

6.3.6 The proposed development will be designed to be an inclusive and welcoming building(s) accessible to all. All of the facilities will be an exemplar of accessibility, fully compliant with all relevant legislative requirements, and therefore maximising opportunities for everyone to benefit.

6.3.7 The proposed development will provide a safe and secure environment for both the residents and visitors. As with any scheme there are a variety of potential security risks, and it is necessary to ensure that security measures are proportional and have regard to the requirement for the Site to be publicly accessible and inviting. In brief, external security will be achieved primarily through vehicle management, access control and a robust building façade.

iv. Lifetime Home Standards & Wheelchair Accessibility

6.3.8 Core Strategy Policy DPD CP14 states that all new homes should be built to Lifetime Homes Standards and 10% of all new housing should be to wheelchair standards. All the units will meet the Lifetime Homes Standards and Unit 7 has been designed to be wheelchair accessible (as shown on the plans).

6.3.9 The roof terraces are well designed, and will receive direct sunlight and will provide sufficient depth to allow access and circulation for a wheelchair. With regards to overlooking, we have included screens on all roof terraces and there will be no privacy issue between the proposed units, as required by Development Management Plan DPD Policy DM DC5.

v. Neighbourliness, Sunlighting & Daylighting

6.3.10 In relation to the effects on neighbouring residents, the Inspector was satisfied that the proposed terrace would be sufficiently far from the gardens of houses on Kingsway so that privacy would not be unreasonably affected.

6.3.11 However, the proposed unit 1 with which the Inspector had some concern has now been omitted in its entirety.

6.4 Affordable Housing

6.4.1 The Applicant has submitted a Viability Assessment to support their case.

6.4.2 The proposal results in the creation of six residential dwellings, and this therefore falls within the remit of Policy DM HO6, which requires a provision for affordable housing, either in kind or as a contribution into the Council's Affordable Housing Fund. As the Site is unlikely to be of interest to a housing association, a contribution is acceptable based on the principle set out in Development Management Plan Policy DM HO6 of capturing the subsidy that a developer would have put in, had the scheme been for affordable housing. This is set out in the Affordable Housing SPD. The policy contribution sought is discounted to represent 30% affordable housing, given the proposal creates six units.

Other Material Considerations

6.5 Demolition

6.5.1 The existing garages on the Site are not of any merit that would justify their retention, or that it can be considered a positive attribute to the surrounding area. We consider that the circumstances of this case, particularly the mixed-use (predominantly residential) benefits that would accrue from the value to be derived from the proposed development, could in any event be seen as overriding.

6.6 Land Uses

i. Loss of Garages

6.6.1 Please refer to the supporting Transport Statement prepared by Paul Mew Associates for details.

6.6.2 The Council has 'in principle' accepted the loss of the garages following detailed Pre-Application Consultation discussions. An analysis of the 'benefits' of the scheme are set out in the subsequent sections of this Statement.

6.6.3 All the garages are below the Council's minimum standard of 5.5 metres (m) by 2.7m.

6.6.4 The level of car parking on the Site has been improved so that there are spare spaces, which will reduce the effect of displacement of cars parked in the surrounding residential area. This will also reduce the demand for additional parking on adjacent roads

6.6.5 It is considered that the proposed loss of the garages would not result in a demonstrable harm to parking in the locality, compliant with Policy DM TP 8 of the Development Management Plan DPD.

ii. Employment Use

6.6.6 Council policy (Development Management Plan DOD Policy DM EM 2) requires sites that were last used for employment purposes to remain in employment use providing they are compatible with the amenity of the surrounding area and access to the site is adequate. Re-use for B1 is considered acceptable in a residential area. In a mixed-use scheme, it is expected that the amount of employment floor space should be maintained or increased.

6.6.7 The car vehicle repair garage has an area of approximately 155 square metres and is positioned at the western end of the Site. It is operated by a mechanic on a part-time basis, who carries out a range of car repairs (totalling five employees).

6.6.8 The existing level of employment space is being re-provided within the proposed scheme. The proposal includes two commercial units totalling approximately 152 square metres, which provides a suitable replacement of employment space within the Site. Two parking spaces (one each) in line with planning policy. There is also space within each office unit to store bikes. The proposed use is a more appropriate use in this residential area than the existing car repair garage and will make a more efficient use of the Site. The proposal, therefore, accords with policies Core Strategy DPD Policy CP19 and Development Management DPD Policy DM EM 2.

6.6.9 This approach is consistent with that taken in other cases where loss of existing employment floorspace has been accepted in return for its replacement with better quality floorspace which provides modern facilities able to be used in a more efficient manner. Examples of this are provided by planning permission 07/3594/FUL in respect of 56-58 Glenthams Road, Barnes and planning permission granted on appeal 10/1484/FUL in respect of 42-44 Charles Street, SW13.

iii. Principle of Residential Use

6.6.10 The Site falls within a predominantly residential area. The proposal would complement the character of the area and will provide a scheme in line with national planning policy objectives and Development Plan policy.

6.6.11 The Site is previously developed land, and the proposal will efficiently and effectively re-use the Site. Therefore, the proposal is supported by the sustainable development principles of the National Planning Policy Framework, and the Core Strategy DPD target that states that 95% of new housing should be built on Brownfield land and emerging government policy that places a presumption in favour of sustainable development.

6.6.12 Core Strategy DPD Policy CP14 states that: *“The density of residential proposals should take into account the need to achieve the maximum intensity of use compatible with local context, while respecting the quality, character and amenity of established neighbourhoods and environmental and ecological policies”*.

6.6.13 The proposed development, comprising of six residential units for young professional or those wishing to downsize, would meet these objectives as the Site lies within an established residential area, is of a comparable scale with the neighbouring development and is in reasonable proximity to amenities and public transport.

6.7 Density

- 6.7.1 The Site is located in a suburban location and has a Public Transport Accessibility Level rating (PTAL) of 2 (entrance to Kingsway) / 3 being close to a train station and bus routes. The expected density range is between 150- 250hr/ha according to the Density Matrix (Table 3.2) set out in the London Plan.
- 6.7.2 Core Strategy DPD Policy CP14D states that density of residential proposals should take into account the need to achieve the maximum intensity of use compatible with the local context, while respecting the quality, character and amenity of the neighbourhood.
- 6.7.3 The density and mix of the scheme has been design-led, determined by the nature of the Site and the scale, form and character of the surrounding area, and in particular its relationship to neighbouring properties. This approach is supported by Core Strategy DPD Policy CP14D. The density of the development proposed complies with these policies.

6.8 Housing Need

- 6.8.1 Core Strategy DPD Policy CP14 sets out the housing targets for the Borough, as established by the London Plan. The minimum strategic dwelling requirement is an additional 2,700 dwellings in the period 2007 to 2017 and an indicative capacity in the range of 150-330 dwellings per year in the ten year period from 2017. Specifically in the 'East Sheen' sub-region, including Barnes and Mortlake, an additional 300 units are required by Policy CP14 in the period up to 2017. These targets have since been updated in the London Plan that stresses that the LPA should seek to achieve and exceed the annual average housing target which is set at 315 dwellings per year for the period up to 2025.

6.8.2 The scheme provides six additional dwellings that will help achieve the Council's housing requirements and is, therefore, strongly supported by Core Strategy DPD policy CP14 and national planning policy guidance.

6.9 Crime Prevention

6.9.1 The garages are not lit at night, and have created an unsafe atmosphere, resulting in complaints made to the site owner regarding anti-social behaviour. Given the location and risks associated with being adjacent to a railway line, this is particularly concerning.

6.9.2 The design, layout and use of the proposal will provide for public safety, deter crime and reduce the fear of crime, helped by the residential units introducing an element of natural surveillance onto the street. Low level street lighting will also be incorporated.

6.10 Noise & Vibration

6.10.1 Please refer to the supporting Noise Impact Assessment prepared by Sustainable Acoustics.

6.10.2 Measured vibration dose values (VDV) were found to be below the threshold where there exists a low probability of adverse comment, and so groundborne vibration due to the railway is not considered an issue. Predicted levels of maximum structure borne noise due to passing trains at night indicated that they may exceed the threshold of 45 dB LAmax.

6.10.3 In conclusion it is considered that the development can achieve recommended levels of internal noise and vibration, provided that a scheme of mitigation is adhered to.

6.11 Sustainable Construction

- 6.11.1 Please refer to the supporting Energy Strategy Report prepared by Syntegra Group.
- 6.11.2 Relevant spatial policies include Core Strategy DPD Policies CP 1 and 2; Development Management Plan DPD Policy DM SD1 focuses on sustainable construction. It states that all development in terms of materials, design, landscaping, standard of construction and operation should include measures capable of mitigating and adapting to climate change to meet future needs. New buildings should conform to the Sustainable Construction Checklist. Following the Government's Ministerial Statement released on 25 March 2015 in response to the Housing Standards Review Consultation, a number of changes have been introduced to technical housing standards in England, including the withdrawal of the Code for Sustainable Homes as a national standard. There are, however, some elements of the Code (water and energy efficiency) in our Local Plan that we will continue to apply.
- 6.11.3 From 6 April 2014, the Council and the Mayor of London apply a 35% reduction in carbon dioxide emissions beyond Part L 2013 of the Building Regulations (over building regulations) from onsite or decentralized renewable energy generation unless it can demonstrate that such provision is not feasible.

6.12 Environmental Constraints

i. Contamination

- 6.12.1 Please refer to the supporting Phase 1: Environmental Risk Assessment prepared by RPS Group.
- 6.12.2 The Environmental Health Department at the Council advised that the Site was used for motor repair services until c.1994 (RPS notes that vehicle servicing currently takes place on site). In view of this, further investigation to determine the Site's suitability for use would be required under Part 2A of the Environmental Protection Act 1990, should the site be proposed for a more sensitive end use.
- 6.12.3 There is the potential for a degree of contamination to exist beneath the west of the Site associated with the current and historical vehicle servicing / repair and the current metal and wood cutting activities as well as other historical potentially contaminative land uses.
- 6.12.4 The area in the west, where the garage and metal / wood cutting activities are present, is proposed for a commercial end use and therefore the vulnerability and sensitivity of these units is considered to be reduced. However, the remainder of the Site is proposed for a residential end use with landscaped areas and communal gardens. This will increase the sensitivity of the Site and future site residents are considered to be potential receptors to any contamination (if present).
- 6.12.5 Furthermore, the Council's Environmental Health Officer advised that given the use of the Site for motor repair services, further investigation would be required should the Site be converted to a sensitive end use.

- 6.12.6 In view of the proposed change of the site to include sensitive end uses, and the potential for contamination to exist beneath the west of the Site, further work is considered necessary to determine the site's suitability for its proposed use (notably in the west of the Site).
- 6.12.7 On the basis of the potential for significant contamination to exist beneath the west of the site, RPS recommends undertaking a localised intrusive environmental ground investigation to establish the nature, extent and implications of any ground contamination beneath the west of the Site. Scope to be confirmed with the Local Authority Environmental Health Officer prior to works commencing.
- 6.12.8 It is envisaged that the above works would be completed under a condition attached to any planning approval granted for the proposed redevelopment of the Site.

ii. Ecology

- 6.12.9 Policy CP4 of the Core Strategy DPD and Development Management Plan DPD DM OS5 requires new development to preserve and where possible enhance existing habitats including biodiversity features.
- 6.12.10 The Site does not form part of any statutory or non-statutory designated nature conservation site. The existing Site is considered to have little biodiversity value as it is entirely covered by garages and concrete.
- 6.12.11 The change of use itself is not considered to be prejudicial to the ecological value of the neighbouring common. While concern could be expressed about the impact of light pollution and noise from residential windows overlooking the common, such noise and light could equally be generated from the existing use.

iii. Archaeology

6.12.12 The Site is identified within the Development Management Plan DPD as being located within an Archaeological Priority Area. Policy DM HD 4 of the DPD seeks to protect, enhance and promote the LPA's archaeological heritage. It is envisaged that archaeological works would be completed under a condition attached to any planning approval granted for the proposed redevelopment of the Site.

iv. Trees & Landscaping

Trees

6.12.13 Please refer to supporting Arboricultural Report and Impact Assessment prepared by Crown Consultants.

6.12.14 Development Management Plan DPD Policy DM DC4 requires landscape proposals for new development to retain existing trees and important landscape features where practicable and include new trees and other planting. The policy requires replacement planting where trees are removed.

6.12.15 The Site is currently completely covered by a hard surface and the proposed scheme will incorporate tree provision and provide significant value. All the trees surveyed are located off-site.

6.12.16 The table below summarises the potential impact on trees due to various activities.

Activity	Trees Potentially Affected
Tree Removal: Retention Category A	None
Tree Removal: Retention Category B	None
Tree Removal: Retention Category C	None
Tree Removal: Retention Category U	None
Tree Pruning	G1, T2, T3, G5
RPA: Foundations	None
RPA: New Surface	None
RPA: Underground Services	None
RPA: Change of Ground Levels	None
RPA: Soil Compaction	None

6.12.17 Other potentially damaging activities often associated with construction sites include demolition or the careless use of plant machinery, hazardous materials, or fires.

6.12.18 It is proposed to prune back the branches trees within G1, T2, T3 and G5 that are growing towards the proposal in order to create a clearance distance of 1.5m. We understand that a party wall agreement is planned which will include such a right of access and pruning over land immediately adjacent to the site.

6.12.19 Such pruning shall require the removal of relatively small secondary branches which should be pruned back to a secondary growth point.

6.12.20 Such a small amount of pruning shall have no impact on local visual amenity and is not considered to be a material planning consideration.

6.12.21 All other tree canopies shall be unaffected by the proposals.

Landscape

6.12.22 While subject to condition, the landscaping proposals retain an air of formality to complement the proposed residential and commercial units whilst introducing planting to support its purpose as communal space.

6.12.23 The divisions between residential and commercial will be created by a yew hedge and shrub planting. By reason of the subdivision being articulated as part of the formal layout of landscaping, the visual impact will preserve the character and appearance of the surrounding area and its setting and is therefore acceptable.

v. Flooding & Sustainable Drainage

6.12.24 Please refer to the supporting Flood Risk Assessment prepared by RAB Consultants.

6.12.25 Development Management Plan DPD Policy DM DC7 requires development to follow the drainage hierarchy when disposing of surface water and to utilise Sustainable Drainage Systems wherever practical. Further details on how groundwater will be managed are recommended to be secured by condition.

6.12.26 The Site is located within Flood Zone 2 (medium probability flooding) as described in the National Planning Policy Framework (NPPF). The NPPF requires a Flood Risk Assessment (FRAs) to be carried out to ensure flood risk to the proposed development is considered as well as the impact the development will have elsewhere on people and property.

6.12.27 The existing understanding of the fluvial flood risk at the site is based on the Environment Agency (EA) detailed flood risk data (Appendix B of the supporting FRA). The EA provided modelled flood levels along with breach modelling results in respect of the River Thames. The conclusion is that the Site is not at risk of tidal flooding from the River Thames both now and in the future due to the presence of the defences and not at risk from a failure of the defences. This FRA also demonstrates that the Site is at low risk of flooding from all other sources.

6.12.28 Flood resistant construction techniques should be employed to ensure that the proposed basement is safe from flooding and damp. Furthermore, this report suggests and encourages the employment of Sustainable Drainage Systems (SuDS) for the management of surface water runoff within the site as a result of the increase in impermeable area.

6.12.29 In conclusion, the proposed development will be safe for its design life and will not increase flood risk elsewhere.

6.13 Planning Obligations

6.13.1 Core Strategy policies CP16 and CP18 set the basis for the creation of sustainable communities. Commensurate with the scale of development and as mitigation, a financial contribution is required for the provision of improvements towards education, health, the public realm/open space and transport.

6.13.2 The Applicant would enter into discussions with the Council on the appropriate planning obligations necessary to mitigate the impact of the proposed development.

6.14 Community Engagement

6.14.1 Following on from Section 3.3 of this Statement, the following exercises / tools were undertaken as part of the Public Consultation process (**Appendix 3** of this Statement):

- Circulation, via mail shot and e-mail, of a Public Consultation Leaflet to local residents along Kingsway, immediately adjacent to the Site, on 9 January 2014 and ward Councillors. Ward Councillors and Planning Officer's at the Council were invited

- A local Public Consultation Exhibition was undertaken on Wednesday 14 January 2015 with boards displaced. The Project Architects, Planning Agent, and Transport Consultant were in attendance to present the scheme and answer any comments / queries raised

7.0 CONCLUSIONS

7.1 Conclusions

- 7.1.1 The Inspector accepted that the proposal would result in a tidying up of the site and that it would give rise to additional homes in a broadly suitable location.
- 7.1.2 It is considered that the shortcomings of the appeal scheme have now been addressed.
- 7.1.3 The aim of this proposal is to create a new development to a revised design consisting of only six residential units, two commercial units and relevant parking, bin storage, amenity space and bicycle storage. Its appearance and scale have been carefully considered to ensure that it will not have a detrimental effect on the surrounding properties. This proposal will enhance the local area by addressing the issue of a shortage of small family homes in London with allocated parking and a safe play area for young children. Furthermore, the neighbouring properties will benefit from the regeneration of a poorly maintained and secluded area into a low rise scheme that is appropriate for the context in which it has been designed. The proposal will also retain the minor employment services on the site through the conversion of the arches.
- 7.1.4 The proposal will be of an appropriate scale and we believe that it will both preserve and enhance the local area.
- 7.1.5 On the basis of the above, we strongly commend the proposals to the Council.