



**47A Lower Mortlake Road**

**Planning Statement**

October 2019

**DP9 Limited**

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## APPENDICES

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## 1. INTRODUCTION

1.1 This report has been prepared by DP9 Ltd on behalf of Westlake Property Limited ('the Applicant') in support of a planning application for the proposed redevelopment of an unused yard into 16 co-living units with high quality internal and external communal living space ('the proposed development') on site referred to as 47A Lower Mortlake Road.

1.2 This Planning Statement has been completed in order to explain the nature of the proposed development and assess it against relevant planning policy and demonstrate its acceptability.

### **The Scheme**

1.3 The application seeks Planning Permission for the proposed development, which comprises a part-2, part-3 storey building, providing 576 sq.m GIA of 'co-living' floorspace, including 16 units designed for single occupancy, and associated internal communal living areas, bin store and plant space, along with additional provision of external private amenity space. At ground floor there are secure and covered cycle parking facilities (17 spaces). Reflecting the excellent accessibility of the site (PTAL 6a), the proposals take the form of a car free-development.

1.4 The proposed development, through the provision of a new, modern co-living building, represents a clear opportunity to deliver the following economic, social and environmental benefits:

- Help to deliver sustainable development in line with the NPPF and facilitate delivery of housing to meet required local needs.
- Provision of a sustainable and high-quality building and associated works, representing a sympathetic and appropriate response to the character of the adjacent Conservation Area.
- Provision of co-living accommodation with modern, high-specification space suitable to meet demonstrable local needs.

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- Building upon the accessible location with an existing excellent level of public transport and pedestrian and cycle accessibility and introducing design measures including site layout, design and management to encourage enhanced pedestrian and cyclist accessibility.
  - Incorporation of sustainable technologies and building improvements to achieve energy efficiency and carbon reduction targets.
  - Transformation of a currently vacant and underutilised infill site, which currently detracts from the quality of this section of Lower Mortlake Street frontage and Blue Anchor Alley, to provide an appropriate use and representing a 'good neighbour' in terms of amenity effects.
  - Generate Community section 106 obligation payments for local benefit.

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## 2. SITE CONTEXT

- 2.1 The site extends to 250 sqm and comprises a vacant former yard (previously used as a temporary car wash and Christmas tree sales yard) which is currently an unused area of hard standing, surrounded by a high brick wall, with the main access directly from the front. It is located on the western end of Lower Mortlake Road, approximately 400m to the north-east of Richmond underground station and 650m to the west of North Sheen train station.
- 2.2 The wider area is characterised by residential uses, with a range of styles and sizes of properties along Lower Mortlake Road. Directly to the north and west of the site lies the Kew Foot Road Conservation Area, characterized in the immediate vicinity of the site by two/three storey brick terraced houses with neat rooflines. There is one grade II listed building to the north of the site consisting of a three-storey bakery with an Art Deco façade.
- 2.3 While the area is predominantly residential, a number of larger structures used as hotels, showrooms and shops lie on the southern side of Lower Mortlake Road. As the street continues westward toward Richmond town centre, it loses its residential character and becomes dominated by retail, food and beverage and service uses.
- 2.4 To the west of the site lies Old Deer Park, as well as a number of outdoor leisure facilities including sports pitches, a golf course and an open-air swimming pool.
- 2.5 Further detail of the Site, these adjacent properties and the wider area is included in the Design & Access Statement and in the supporting plans and drawings submitted as part of this planning application.
- 2.6 The Site is accessible by public transport with the nearest bus stop less than 50m to the east on Lower Mortlake Road. These stops primarily support local services in Richmond and the south east. The Site is also served by train (South-West Rail) at both Richmond Station and North Sheen Station, both of which are within walking distance of the site. In addition, the site is served by Overground and District line underground

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services at Richmond Station. Reflecting these links, the Site has a Public Transport Accessibility Level (PTAL) of 6a (with 6b being the highest).

### **Planning History**

- 2.7 Some planning applications have been made on site, however most have either been withdrawn or refused. In 2002, consent was granted for the development of a three storey B1 office building on site, however these plans were subsequently abandoned on the basis that this use was considered to be unviable. This is a relevant point to note as part of this planning application.
- 2.8 Historically (and most recently) the Site has been used as a car wash, a car park, and as a yard to sell Christmas trees. Consent was not sought for these uses by previous owner.

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**3. PRE-APPLICATION DISCUSSIONS & CONSULTATION**

- 3.1. Prior to the submission of this application, pre-application discussions have been held with LB Richmond Planning officers. We have had a formal pre-application meeting on 22 May 2019 receiving a written response on 17 June 2019. Comments made have been addressed as part of the submission.
  
- 3.2. Further detail about the design evolution of the scheme is set out in the Design & Access Statement submitted in support of this application.

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#### 4. APPLICATION PROPOSALS

4.1. The planning application has been submitted in full to the London Borough of Richmond upon Thames (“LB Richmond”) and seeks planning permission for the following development:

***“Construction of a part 2/3 storey building to provide 16 co-living units (sui generis), associated internal and external communal facilities, and bicycle parking spaces***

4.2. The Planning Application comprises of the following:

- Completed Application Forms and Ownership Certificates;
- Application Plans and Drawings (October 2019) prepared by Lynas Smith;
- Design & Access Statement (October 2019) prepared by Lynas Smith;
- Planning Statement (October 2019) prepared by DP9;
- Heritage Statement (October 2019) prepared by Heritage Collective;
- Transport Statement (October 2019) prepared by TTP;
- Daylight, Sunlight and Overshadowing Study (October 2019) prepared by TFT;
- Surface Water Drainage Strategy (October 2019) prepared by Constructure
- Energy & Sustainability Statement (October 2019) prepared by JAW; and
- Noise & Vibration Assessment Report (October 2019) prepared by Auricl.

4.3. Against this background, this Statement provides an overview of all aspects of the proposed development and an assessment of its appropriateness against the Development Plan and other material considerations. The scope of this Statement is as follows:

- Section 2 describes the Site, the main features of the surrounding area and the Site’s planning history.
- Section 3 sets out the planning history of the site.
- Section 4 outlines the content of pre-application meetings held with LB Richmond in relation to the proposed scheme.



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- Section 5 describes the proposals set out in the application.
  - Section 6 provides the planning policy context which has informed the application.
  - Section 7 gives an assessment of the proposals in light of the planning policy set out in section 6.
  - Section 8 provides a conclusion to the planning statement.

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## 5. PLANNING POLICY FRAMEWORK AND OVERVIEW

- 5.1. This section provides a brief summary of the key planning policies relevant to the Site and its redevelopment.
- 5.2. Section 38(6) of the Planning and Compulsory Purchase Act 2004 ('the 2004 Act') requires that planning applications are determined in accordance with the development plan unless material considerations indicate otherwise. This statutory duty is repeated at paragraph 8 of the NPPF (February 2019). The development plan for the Site, to which significant weight can be attached, comprises the London Plan (March 2016) and the Royal Greenwich Local Plan: Core Strategy with Detailed Policies ('Core Strategy') (July 2014).
- 5.3. A revised draft version of the New London Plan has recently been published (August 2019) following examination in public from December 2018 to April 2019. The Inspectors report was subsequently published in October 21<sup>st</sup> 2019, and it is expected that the Draft Plan will be adopted in February/March 2020.
- 5.4. We are not aware of any Neighbourhood Plan intentions for this area, either at this moment in time or in the foreseeable future.
- 5.5. In light of this context, this section now sets out the planning policy framework relevant to the Site and proposed development.

### **National Planning Policy Framework**

- 5.6. The NPPF was published in February 2019 (replacing the previous July 2018 version) and sets out the Government's objectives for achieving sustainable development.
- 5.7. The NPPF establishes a presumption in favour of sustainable development. Paragraph 8 confirms there are three dimensions to sustainable development: economic, social and environmental. This includes *"ensuring that a sufficient number and range of*

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*homes can be provided to meet the needs of present and future generations”.*

- 5.8. When making planning decisions, paragraph 11 of the NPPF confirms that there should be a presumption in favour of sustainable development and that planning permission should be granted where development proposals accord with the development plan. This approach is applied in the assessment of the proposed development.
- 5.9. The NPPF then outlines a series of considerations against which development should be assessed. In terms of the proposed development the relevant considerations are:
- Chapter 5 – Delivering a sufficient supply of homes;
  - Chapter 8 – Promoting healthy and safe communities;
  - Chapter 9 – Promoting sustainable transport;
  - Chapter 11 – Making effective use of land;
  - Chapter 12 – Requiring good design;
  - Chapter 14 – Meeting the challenge of climate change, flooding and coastal change;
  - Chapter 15 – Conserving and enhancing the natural environment; and
  - Chapter 16 – Conserving and enhancing the historic environment.
- 5.10. NPPF paragraph 59 stresses that *“to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed”*. The proposed development responds positively to this requirement through the delivery of co-living units on this unused site to meet demonstrable housing needs.
- 5.11. Paragraph 91 places importance on delivering healthy, inclusive and safe places including through the promotion of social interaction, safe and accessible spaces and encouraging walking and cycling. The proposed development is consistent with these goals.

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- 5.12. NPPF paragraph 102 requires development proposals to consider transport issues from an early stage, so that impacts can be addressed, opportunities to encourage non-car means of travel adopted and that the design of schemes can be appropriately developed. The process of developing the scheme through early design concepts, pre-application engagement has ensured that such issues have been considered and addressed through inherent design features, and by making the scheme a car-free development.
- 5.13. Whilst referring to the development of planning policies, the NPPF is clear that local parking standards should take into account site accessibility; the type, mix and use of development; public transport access; and local car ownership levels (paragraph 105). The car parking strategy and interpretation of adopted standards reflects these important considerations.
- 5.14. Paragraph 109 is clear that *“development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe”*. The proposed development does not give rise to such impacts and as such is considered to be acceptable in terms of highways and related matters.
- 5.15. Paragraph 110 encourages proposals to be located and designed to achieve a number of specific objectives, including: the prioritisation of pedestrian and cycle movements; providing safe and secure layouts reducing conflict between transport users; and meeting the needs of people with disabilities. The proposed development will achieve these key practical targets.
- 5.16. A clear priority of the NPPF is to *“promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions”* (paragraph 117). In response, the proposed development ensures that a vacant and thus underused site is brought forward into active use, specifically to deliver new high quality co-living accommodation in an established residential location.

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- 5.17. Paragraph 118 goes on to say that planning decisions should “*give substantial weight to the value of using suitable brownfield land within settlements for homes*”, and “*promote[ing] and support[ing] the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example ... car parks...)*”. The proposed development specifically addresses and supports this central policy requirement.
- 5.18. Paragraph 123 states that “*it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site*”. Again, the proposed development directly responds to this through the delivery of an appropriate co-living scheme.
- 5.19. The NPPF requires high quality design and good architecture, with paragraph 124 adding that “*the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve*”. Paragraph 127 sets out detailed points on how this should be achieved, and includes ensuring that development functions well; adds to the overall quality of the area; is visually attractive; is sympathetic to local character and history; maintains a strong sense of place; optimises the potential of the site; and creates safe, inclusive and accessible places. The proposed development is considered to achieve these requirements as they relate to design.
- 5.20. The NPPF sets an expectation that applicants “*work closely with those affected by their proposals to evolve designs [and that where this can be demonstrated] ... new development should be looked on more favourably than those that cannot*” (paragraph 128). Pre-application engagement with LB Richmond has been undertaken to achieve a high-quality scheme with comments feeding into the final design. Local engagement has also been achieved through meeting with local residents and groups representatives.
- 5.21. NPPF paragraph 131 adds that, “*great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the*

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*standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings*". The proposed development is designed to replace a vacant and poorly kept site, detracting from the streetscene, with a high-quality and innovatively designed building, informed by its surroundings and context.

- 5.22. Paragraph 150 states that new development should *"help to reduce greenhouse gas emissions, such as through its location, orientation and design"*, and *"take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption"* (paragraph 153). The proposed development incorporates measures, inherent to the design, to achieve this. Details are provided in this Statement and in further details in other core planning documents submitted with this application.
- 5.23. NPPF paragraph 170 requires a contribution to and enhancement of the natural local environment, including through *"minimising impacts on and providing net gains for biodiversity"*. The proposed development provides opportunities for private planting on a site where there are currently no natural habitats.
- 5.24. Regarding the Site's location adjacent to the Kew Foot Road Conservation Area, the NPPF requires heritage assets to be conserved *"in a manner appropriate to their significance"* (paragraph 184) with applications providing a description of the significance of the asset including the contribution it makes to setting (paragraph 189). A detailed assessment of the proposals is provided in the Heritage Statement (and in the Design & Access Statement) outlining the significance of the Site.
- 5.25. The NPPF is clear that, *"where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use"* (paragraph 196). It is added that *"in weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset"* (paragraph 197).

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- 5.26. In terms of decision-making, it is recognised that new development can make a positive contribution to local character and distinctiveness (and where achieved this should be supported) (paragraph 200).

#### **Planning Policy Guidance**

- 5.27. March 2014, the Government launched the Planning Practice Guidance (PPG) as an online (and updated) web-based resource. This is a material consideration in planning decisions. Relevant parts of the PPG are referred to in specific supporting documents, where required.

#### **The Development Plan**

##### ***The Draft London Plan (Revised version - August 2019)***

- 5.28. The following Draft London Plan policies are of relevance to the Site and proposed development:
- Policy GG1 (Building strong and inclusive communities) seeks to “*deliver strong and inclusive communities*” by ensuring that new buildings are designed to reinforce the legibility of neighbourhoods, and adaptable to changing community requirements
  - Policy GG2 (Making the best use of land) seeks to “*create high-density, mixed use places*” by exploring the potential to intensify land uses to support additional homes.
  - Policy GG3 (Creating a health city) requires developments to improve Londoner’s health by promoting active and healthy lifestyles,
  - Policy GG4 (Delivering the homes Londoners need) aims to ensure that more homes are delivered throughout London, including specialist housing, through

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the use of small sites.

- Policy GG5 (Growing a good economy) seeks to ensure that London provides sufficient levels of high-quality housing, such as co-living, to maintain economic competitiveness.
- Policy D1 (London’s form and characteristics) aims to ensure that land is used efficiently and maximizes density, and that schemes *“respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality.”*
- Policy D3 (Inclusive design) requires that the highest standards of accessible and inclusive design
- Policy D7 (public realm) requires developments to *“ensure public realm is safe, accessible, inclusive, attractive, well-connected... relates to the local and historic context, and incorporates the highest quality design.”*
- Policy H2 (Small sites) outlines the importance of small sites in the delivery of housing in London, and gives *“the presumption in favour of small housing developments which provide between one and 25 homes.”* The policy specifically references infill developments on vacant and underused land, as is the case here, and sites within PTAL zones 3-6 or within 800m of a tube station.
- Policy HC1 (Heritage conservation and growth) requires developments which affect heritage assets to *“conserve their significance and appreciation within their surroundings”*
- Policy SI1 (Air quality) requires developments to prevent or minimize exposure to existing air pollution, and make provision to address local problems of air quality



- Policy SI5 (water infrastructure) seeks to ensure that developments “*improve the water environment and ensure that adequate wastewater infrastructure is provided*”
- Policy SI8 (Waste capacity and net waste self-sufficiency) sets out the criteria which new proposals should be evaluated against in relation to waste disposal
- Policy SI13 (Sustainable Drainage) requires developments to “*aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.*”
- Policy T5 (Cycling) sets out the minimum standards for the provision of cycle parking for new developments.
- Policy T6 (Car Parking) seeks to limit the car parking provided in any development. It states that “*car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity.*” It states that any development within PTAL 5-6 should be car-free.

***LB Richmond Adopted Local Plan (2018)***

- The following Core Strategy policies are of relevance to the Site and proposed development:

Policy LP1 (Local Character and Design Quality) establishes that all new development will be of “*high architectural and urban design quality*”

- Policy LP2 (Building Heights) requires that new buildings strengthen the setting of the borough’s townscapes, and generally reflect the prevailing building heights within their vicinity.
- Policy LP3 (Designated Heritage Asset) states that new developments should “*conserve and, where possible, make a positive contribution to, the historic*

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*environment of the borough*” by preserving and enhancing the character and appearance of conservation areas

- Policy LP8 (Amenity and Living Conditions) establishes that all development is required to protect the amenity and living conditions of the occupants of new and existing properties, by ensuring that the design of new buildings enable good living standards
- Policy LP10 (Local environmental impacts, pollution and land contamination) seeks to ensure that new development does not lead to *“detrimental effects on the health, safety and the amenity of existing and new users of occupiers of the development site, or the surrounding land”* It seeks to ensure acceptable levels of air quality, noise and vibrations, light pollution, odours and fume control, land contamination, and construction and demolition disturbances.
- Policy LP11 (subterranean developments and basements) seeks to resist the development of basements of more than one storey below the existing ground level.
- Policy LP16 (Trees, woodlands and landscape) requires that existing trees are protected, and that developments provides new tree, shrubs and other vegetation in order to deliver amenity and biodiversity benefits.
- Policy LP17 (Green roofs and walls) states that *“green roofs and/or brown roofs should be incorporated into new major developments with roof plate areas of 100sqm or more where technically feasible”*
- Policy LP20 (Climate Change Adoption) is consistent with NPPF paragraph 149 in terms of seeking developments to be resilient to the future impacts of climate change.

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- Policy LP21 (Flood risk and sustainable drainage) sets out the requirements for carrying out flood mitigation measures.
  - Policy LP22 (Sustainable design and construction) requires that developments *“achieve the highest standards of sustainable design and construction to mitigate the likely effects of climate change”*.
  - Policy LP23 (Water resources and infrastructure) states that developments which pose an unacceptable threat to the borough’s rivers, surface water and groundwater quality will be resisted.
  - Policy LP24 (Waste Management) sets out the borough’s requirements in relation to waste management.
  - Policy LP34 (New Housing) outlines the borough’s targets for the delivery of housing up to 2025. The plan aims to deliver an additional 3150 units from 2015-2025.
  - Policy LP39 (Infill, backland and back garden development) requires that infill development must *“reflect the character of the surrounding area and protect the amenity and living conditions of neighbours.”*
  - Policy LP 40 (Employment and Local Economy) outlines the principles through which the Borough aims to maintain a diverse and strong local economy.
  - Policy LP42 (Industrial land and business park) states that there is a presumption against the loss of industrial land, and that the loss of industrial space will only be permitted where it can be clearly demonstrated that *“there is no longer a demand for an industrial based use in this location and that there is not likely to be in the near future.”*
  - Policy LP44 (sustainable travel choices) aims to ensure that developments provide sustainable means of transport and minimize congestion, air pollution

and carbon dioxide emissions.

- Policy LP45 (parking standards and servicing) requires that new development makes provision for the accommodation of vehicles in order to provide for the needs of the development while minimizing the impact of car-based travel

5.29. A number of supplementary planning guidance documents have been published in support of the London Plan. Those that have informed the design and the assessment in Section 5 of this Statement are set below.

- Accessible London: Achieving an Inclusive Environment SPG (October 2014);
- Sustainable Design and Construction SPG (April 2014); and
- Housing SPG (March 2016).

5.30. In addition, LB Richmond have published the following which have informed the proposed scheme and the assessment.

- Richmond and Richmond Hill Village SPD (2016);
- Design Quality SPD (2006);
- Refuse and Recycling Storage Requirements SPD (2015);
- East Greenwich conservation Area Appraisal SPD (2013); and
- Conservation Area SPG (2002).

### **Policy Conclusions**

5.31. The Site is currently vacant having formerly been used as a car wash, car parking and for the storage and sale of Christmas trees. The proposed development of the Site to provide high quality co-living (sui generis) floorspace is supported in principle in the Development Plan and would achieve the most efficient and optimum use of site, meeting both strategic policy targets and local needs.

5.32. The policy basis and planning guidance support for the provision of additional living accommodation is a key consideration and the proposed development assists and is

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wholly consistent with the delivery of this Borough, and London-wide and national strategic objective.

- 5.33. The Site, by virtue of it being unused and not well maintained is considered to detract from the streetscene. National (NPPF), regional (London Plan) and local (Richmond Local Plan) policy all support high quality design which improves the appearance of Sites, especially adjacent to Conservation Areas, as is the case here, where the proposals are in-keeping with the setting of the adjacent Conservation Area.
- 5.34. The proposed development is considered to be consistent with the NPPF, and the Development Plan, in terms of the principle of development and also in terms of design and other technical matters including transportation, neighbour amenity and sustainability.
- 5.35. Section 5 sets out a comprehensive assessment of the Site and proposed development's compliance with the Development Plan and other material considerations including the NPPF.

## 6. PLANNING POLICY ASSESSMENT

6.1. This section outlines our assessment of the proposed development against the planning policy context identified in Section 4. Reference is made to the Design & Access Statement, plans / drawings and other consultants' documents submitted in support of the Planning Application, where more detail can be found.

### Decision-making approach

6.2. As to the NPPF, it is informative to consider whether the proposed development constitutes sustainable development and will thus benefit from the NPPF paragraph 11 presumption in favour of granting planning permission.

6.3. The proposed development represents sustainable development for reasons which are summarised below and further supported in the comprehensive technical material that is being submitted in support of this planning application:

- **Economic Role:** the proposed development will not harm the building of a strong, responsive and competitive economy through the 'occupation' of the site and proposed appropriate co-living use. There is a strategic drive to deliver additional living accommodation (on a local, regional and national level) and this can help "to support growth" (NPPF paragraph 8) through the maintenance of housing supply to meet demand associated with job creation and investment opportunities. As such the proposals are considered consistent with the NPPF and specific strategic parts of the Development Plan.
- **Social Role:** the proposed development will make a series of contributions helping maintain a strong, vibrant and healthy community. The proposed development, through the design approach adopted, creates a high-quality built environment, ensuring the integrity and the quality of the street scene is upheld. Furthermore, the design of the building ensures that it is inclusive and accessible to all. The scheme also meets identified and demonstrable local needs through the provision of co-living accommodation. This accords with relevant parts of the NPPF and the Development Plan, including Draft London Plan Policy GG1, GG2,

GG3, GG4 and GG5, and Local Plan Policies LP1, LP8 and LP10 in particular. It also accords with the GLA's 'Accessible London' guidance.

- **Environmental Role:** the proposed development will contribute towards the protection of the natural environment through the introduction of sustainable design and materials and the optimised use of the site in an accessible and sustainable location. The historic and built environment will be protected and also enhanced due to the high level of design applied to the proposed building and the impact that this will have on the streetscene, including the Conservation Area and other considerations. As such the proposed development is consistent with Chapters 12 and 16 of the NPPF and a number of development management policies, discussed later, in the adopted Development Plan. The proposals are also consistent with design policies set out in the Development Plan and the NPPF.

6.4. Having established that the proposed development is acceptable in principle, this assessment now turns to specific development management matters, with the key issues to be tested as part of this assessment being:

- Loss of existing use;
- Appropriateness of proposed use;
- Impact on neighbour amenity;
- Design approach;
- Townscape and heritage considerations;
- Transport and accessibility;
- Sustainability; and
- Surface Water & Foul Drainage

#### **Loss of Existing Use**

6.5. The Site is currently vacant having formerly been used as car parking, a car wash and a yard to hold Christmas trees. None of these uses gained consent from the local

authority, and all of the uses have now ceased.

- 6.6. Although the site is considered to be a non-designated industrial site, it is evident by virtue of its vacancy that there is no demand for an industrial use at this location, and it is unlikely for demand to emerge in the future. The site has been marketed through a commercial agent for employment/storage uses for the past 32 months, since February 2017. Due to the restricted access to the site and lack of turning circle for larger vehicle, there has been little interest, and it is considered to be unsuitable by prospective occupiers.
- 6.7. The marketing of the site exceeds the requirements set out in Appendix 5 of Richmond's Local plan, which state that sites should be marketed for a period of two continuous years. Therefore, it is considered acceptable by Local Plan policy LP42 and part C of Draft London Plan policy E4 for the site to be redeveloped for residential purposes. Further details on the marketing of the site are set out in appendix 2 of this document.

#### **Appropriateness of Proposed Use**

- 6.8. The site is on an established residential street and, as outlined above, is considered to be appropriate for redevelopment. The provision of co-living floorspace is consistent with strategic aims, nationally, regionally and locally, in terms of the delivery of housing. The NPPF (chapters 5 and 11) emphasises this point and this is reflected in London Plan Policies 3.3 and 3.4 and LB Richmond Local Plan Policy LP34.
- 6.9. As the proposed redevelopment relates to an infill site, the appropriateness of the proposed residential use needs to be demonstrated in accordance with the requirements of Local Plan policy LP39, and the factors set out within the policy, which are addressed below:
- i. As the proposed development is terraced, it retains similar spacing between new buildings to the established spacing within the neighbourhood
  - ii. The proposed development retains plots of sufficient width for adequate separation between dwellings



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- iii. The proposal retains the existing garden space for adjacent dwellings
  - iv. The proposal retains the existing building roof-line with its neighbouring dwelling
  - v. Through the enhancement of Blue Anchor Alley, the proposal is considered to significantly benefit the street frontage, and legibility of the area
  - vi. The design of the proposal has been informed by the form and styles of buildings in the vicinity of the site, and uses materials sympathetic to its surroundings
  - vii. The proposal will not result in any loss of privacy to the existing surrounding homes or gardens
  - viii. The proposal meets the required standards for recycling and refuse storage as well as cycling parking as set out in the Draft London Plan and Local Plan
  - ix. The proposed scheme will not result in any negative visual impact on neighbours, in fact it can be said that it will enhance the streetscape through the regeneration of an unused and unattractive site
- 6.10. By virtue of satisfying these tests under Local Plan policy LP39 for the redevelopment of an infill site, the principle of the proposed residential development is therefore considered to be acceptable in this location.
- 6.11. On a more specific note, the proposed development is consistent with the policy requirements and guidance in relation to the following criteria:

*Density* – In accordance with the Local Plan Strategic Vision, the proposal seeks to ensure that the sustainable nature of the site (PTAL rating 6a) is utilised with a higher density scheme

*Design Standards and Amenity Standards* – The scheme has been designed taking into account the requirements set out in Policy LP1 – Local Character and Design Quality. The scheme has been designed to be sensitive to the surrounding heritage assets, and significantly enhances the public realm of the area by re-activating Blue Anchor Alley. Further information is provided in the Design & Access Statement in this regard.

- 6.12. Against this background, the proposed development complies with the requirements of the NPPF and the Development Plan in terms of delivering an appropriate use in a sustainable location on an infill site and, of considerable importance, delivering strategic national, regional and local policy requirements. The proposed development is not considered to fall under the C3 use class, and as such the delivery of affordable housing is not a policy requirement. The proposed co-living scheme seeks to offer a flexible form of accommodation to meet a specific demonstrable need, and can therefore be considered inherently affordable in itself (at circa £800 to £1,000 pcm for a co-living apartment with access to the wider facilities).

#### **Impact on Neighbourhood Amenity**

- 6.13. The scheme has been fully tested to ensure its appropriateness and its acceptability in terms of planning policy requirements and guidance. In terms of the impact on daylight and sunlight, the built form of the proposed development is considered acceptable. TFT have undertaken a daylight / sunlight analysis and their report submitted in support of this application states that, *“83.3% of the 42 windows considered will fully comply with BRE target values. 5 of the 7 windows falling below the suggested BRE benchmark are secondary windows serving rooms that have the benefit from receiving daylight from other windows. The NSL results indicated that 25 (96.1%) of the 26 rooms considered will fully comply with the BRE target values. The only room that marginally falls below the suggested BRE benchmark maintains an NSL of over 68% indicating that the space will remain well-lit in the proposed condition..”*. Further detail is included in this report which concludes, *“the Lynas Smith Architects scheme massing is in accordance with the aims of the London Borough of Richmond upon Thames planning policy in daylight and sunlight terms.”* The proposed development is therefore considered to satisfy policy objectives.
- 6.14. Vehicular trips by future residents will be limited, as no car parking spaces are to be provided. Servicing, deliveries and refuse collection are expected to be limited, and will enter from the front of the proposed building, off Lower Mortlake Road, in accordance with existing rules and restrictions and consistent with other properties along the street. The Applicant will ensure that the site will be managed to allow refuse collection to access bins from the bin store to the rear of the Site to the street

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for collection. Full details of these elements are set out in the accompanying Transport Statement and Design & Access Statement.

- 6.15. Plant equipment is to be located at ground floor level within the proposed building. As such, there will be no noise issues associated with plant equipment. Future residents will have access to outdoor private amenity spaces, although these have been positioned so as to remove unreasonable noise and disturbance on neighbouring residential properties. Full details of the noise impact approach are set out in the Noise Impact Assessment Report (prepared by Auricl) and plans submitted in support of this planning application.
- 6.16. The proposed development complies with national, regional and local requirements, making the scheme acceptable against the requirements in Sections 12 and 15 (paragraph 180 in particular) of the NPPF, London Plan Policy 7.15 and Richmond Local Plan policies

#### **Design Approach**

- 6.17. An important planning consideration is whether the proposed development is considered to be acceptable in terms of design, paying particular regard to the immediate surroundings and the local context including the setting adjacent Conservation Area.
- 6.18. The design and layout approach of the proposed development is outlined in full in the submitted plans and drawings and Design & Access Statement (prepared by Lynas Smith) which present the layout, scale and appearance of the proposed development. Detailed elevational drawings have also been prepared and show the proposed fenestration and palette of materiality of the scheme.
- 6.19. Recognising national and local policy requirements and guidance, the scheme has been carefully designed to; respond to the specific constraints and opportunities of the Site; respect the local character and context of the its surroundings, notably the neighbouring Conservation Area; and meet the needs of the Applicant in providing a viable and deliverable scheme capable of securing the benefits associated with the

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proposals.

- 6.20. The proposed development has accordingly been designed to achieve the objectives of Sections 12 and 16 of the NPPF. In particular, the proposals are considered to optimise the potential of the Site, through an innovative design considered to improve the character and quality of the area.
- 6.21. In designing the scheme, the architects have undertaken a thorough approach to understanding and complimenting local character, both in terms of size, scale and design through to materials being uses historically and more recently. As such, the proposed development is consistent with Draft London Plan Policies D3, D4, D5, D6 and, owing to the architectural quality of the proposed building, Policy D2.
- 6.22. Considering LB Richmond policies, the proposed development complies with Local Plan Policy LP1, LP2, LP8, LP22 and through the careful design of the scheme and respectful relationship with the its surroundings (including the Conservation Area), LP3.
- 6.23. The evolution of the scheme, in design terms, has been borne out through engagement with LB Richmond during and following our pre-application meeting. Paragraph 128 of the NPPF states that this should result in the presented scheme being *“looked on more favourably”*.

#### **Townscape and Heritage Considerations**

- 6.24. Further to the assessment of the design approach more generally, the NPPF is clear that heritage assets, namely the Conservation Area and nearby locally listed properties, are to be conserved *“in a manner appropriate to their significance”* (paragraph 126).
- 6.25. As required by paragraph 184 of the NPPF, the accompanying Heritage Statement (prepared by Heritage Collective) provides a description of the significance of these assets, and assessment of the impact or effects of the proposed development. The Statement says that, in terms of the Conservation Area, the site as it currently stands

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“present[s] an unsightly gap in the immediate setting of the Conservation Area, which is predominantly a tightknit residential development.” The report goes on to state that “The scheme offers a clear improvement in views, appearance and safety within the immediate setting of the heritage assets. It has been developed alongside the Council’s advice and is a sensitive and sustainable solution for the Site, respecting its historic context.”

- 6.26. In terms of policy requirements, considering the location of the site adjacent to the Kew Foot Conservation Area, and in relation to the surrounding Listed Buildings, the scheme responds positively to the setting of these heritage assets protecting and not harming their significance.

#### **Transport and Accessibility**

- 6.27. A transport Statement prepared by TTP accompanies this application and demonstrates the acceptability of the proposed development in respect of the impact of the proposals on the local highway network, specifically in relation to the approach to car parking; the level of cycle parking provision; and the deliveries, servicing and refuse collection strategy.
- 6.28. The Site is accessible by non-car modes, including excellent levels of access to public transport (the Site has a PTAL rating of 6a) as well as walking and cycling links in the vicinity of the site. There are well maintained footways connecting the Site and these offer convenient access to the local area and amenities as well as public transport opportunities.
- 6.29. The scheme is particularly focused towards those traveling by non-car modes, through being a car-free development (and restricted access to on-street parking permits) and the provision of 17 cycle parking spaces to the front of the Site (in line with cycle-parking standards).
- 6.30. On the basis of the assessment undertaken as part of the Transport Statement, the scheme is considered to comply with the terms of NPPF (Chapter 9), where sustainable transport solutions are promoted and also Chapter 8 (Promoting Healthy

Communities). The proposals are also consistent with key Development Plan policies in the London Plan and LB Richmond's Local Plan.

### **Sustainability**

6.31. The Applicant's intention is to create an energy efficient and sustainable scheme that is attractive to prospective end users and which is fit for purpose for the lifetime of the building. As such, a number of features are introduced to provide a high-performance building in terms of sustainability and energy consumption. Further detail is set out in the Energy & Sustainability Statement prepared by JAW. In summary, these include:

- High quality building fabric and materials, including high performance solar glazing (where possible), high levels of air tightness and a reduction in thermal bridging, to minimise energy consumption and loss;
- Use of high efficiency heating and lighting and control;
- Installation of energy efficient applications, where possible.
- Enhanced daylight usage to minimise energy use; and
- Installation of roof level photovoltaic panels.

6.32. As required by the London Plan (particularly Policy 5.2) and Local Plan policy LP22, the proposed development will follow the hierarchy of energy efficiency, to be lean, clean and green.

6.33. In addition to the scheme design and energy efficiency and performance of the proposals, the proposed development is inherently sustainable by virtue of the level of accessibility by modes other than private car and also the promotion of trips on foot and by bike (see Transport Statement).

6.34. In summary, the proposed development is considered to comply with the NPPF (chapter 15 in particular), London Plan Policies 5.2, 5.3, 5.4 and 5.9 and Local Plan Policy LP22.

### **Surface Water and Foul Drainage**

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6.35. A Surface & Foul Water Drainage Strategy prepared by Constructure Limited accompanies this application, which demonstrates The Proposed Development introduces a blue roof system to aid the attenuation of excess water.

## 7. CONCLUSIONS

- 7.1. The proposed development represents a positive investment on Lower Mortlake Road through the provision of additional high-quality co-living floorspace, designed to meet demonstrable local housing requirements and need. Moreover, it delivers a modern, sustainable and high-quality design approach and associated improvements, representing an appropriate response to the character of the Site and immediate area, recognising the location of the site adjacent to the Kew Foot Conservation Area.
- 7.2. The proposed development presents a clear opportunity to deliver the following economic, social and environmental benefits:
- Help to deliver sustainable development in line with the NPPF and facilitate delivery of housing to meet required local needs.
  - Provision of a sustainable and high-quality building and associated works, representing a sympathetic and appropriate response to the character of the Kew Foot Conservation Area.
  - Provision of high quality co-living accommodation with modern, high-specification space suitable to meet the demonstrable needs of the local housing market and contribute to meeting wider housing delivery targets.
  - Building upon the accessible location with an existing excellent level of public transport and pedestrian and cycle accessibility and introducing design measures including site layout, design and management to encourage enhanced pedestrian and cyclist accessibility.
  - Incorporation of sustainable technologies and building improvements to achieve energy efficiency and carbon reduction targets.
  - Transformation of a currently vacant and underutilised infill site, which currently detracts from the quality of this section of Lower Mortlake Street frontage and Blue Anchor Alley, to provide an appropriate use and representing a 'good neighbour' in terms of amenity effects.
  - Generate Community Infrastructure Levy payments and section 106 obligations for local benefit.



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- 7.3. For the reasons set out in the comprehensive material which is submitted in support of this planning application (including this Planning Statement), it is plain that the proposed development accords with the development plan (when read as a whole).
- 7.4. Accordingly, it benefits from the statutory presumption set out in section 38(6) of the 2004 Act. Moreover, this material also demonstrates that the proposed development comprises sustainable development within the meaning of the NPPF, such that it engages the presumption set out in paragraph 11. This strongly reinforces the policy support for the proposed development. It follows that, upon any application of section 38(6) of the 2004 Act, planning permission should be granted for the proposed development without delay.