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# Manor Road / Richmond

## Planning Statement

Avison Young

February 2019

# Homebase Manor Road

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For and on behalf of GVA Grimley Limited

# 1. Introduction

1.1 This Planning Statement has been prepared by Avison Young and is submitted in support of an application made by Avanton Richmond Development Ltd (the 'Applicant') that seeks full planning permission for the redevelopment of the Homebase store at 84 Manor Road, North Sheen (the 'Site').

1.2 The Application is submitted to the London Borough of Richmond Upon Thames ('LBRUT'). Approval is sought for the following description of development:

*Demolition of existing buildings and structures and comprehensive residential-led redevelopment of four buildings of between four and nine storeys to provide 385 residential units (Class C3), flexible retail /community / office uses (Classes A1, A2, A3, D2, B1), provision of car and cycle parking, landscaping, public and private open spaces and all other necessary enabling works.*

1.3 This Statement presents the planning case for the Proposed Development, including an appraisal of the scheme against the relevant planning policy framework.

- **Section 2** explains the benefits of the scheme;
- **Section 3** describes the site (including its planning history) and the proposed development;
- **Section 4** sets out the specification of the planning application;
- **Section 5** sets out the pre-application consultation undertaken;
- **Section 6** outlines the planning policy framework relevant to the determination of the application;
- **Section 7** assesses the application against that framework;
- **Section 8** sets out the draft Heads of Terms to inform the preparation of a Section 106 Agreement and relevant Community Infrastructure Levy information; and
- **Section 9** summarises the planning case for the Proposed Development and concludes.

## Supporting Information

1.4 The scope of plans and documents submitted as part of the planning application has been agreed with planning officers during pre-application consultation. The Application comprises the following documents, which should be read in conjunction with this Planning Statement:

- Cover Letter
- Application form, certificates and notices;
- CIL Additional Information Form;
- Plans (refer to the drawing schedule for a full list of application drawings and reference);
- Design and Access Statement (including Residential Standards Assessment, refuse strategy, accessibility statement);
- Development Schedule;

- Landscaping Scheme and Open Space Assessment;
- Affordable Housing Statement;
- Financial Viability Assessment;
- Statement of Community Involvement;
- Townscape and Views Assessment;
- Heritage Statement;
- Daylight/Sunlight Assessment;
- Noise and Vibration Impact Assessment;
- Air Quality Assessment;
- Arboricultural Impact Assessment;
- Archaeological Statement;
- Flood Risk Assessment (including a Statement on Sustainable Urban Drainage Systems and Foul Sewage);
- Utilities Statement;
- Land Contamination Assessment;
- Transport Statement, Travel Plan and Delivery Servicing Management Plan;
- Health Impact Assessment;
- Biodiversity Survey and Report;
- Lighting Strategy;
- Wind Microclimate Assessment;
- Operational Waste Management Plan;
- Energy Statement;
- Sustainability Statement (including BREEAM report and Sustainable Construction Checklist);
- Archaeological Statement;
- Framework Construction Management Statement; and
- Draft Construction Environmental Management Plan (including draft Construction Traffic Logistics Plan).

1.5 It should be noted that this Planning Statement also includes a Retail Impact Assessment.

## Environmental Impact Assessment

1.6 A request for a formal Screening Opinion was submitted to LBRUT on 12 November 2018 in accordance with Regulation 6 (2) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

1.7 On 14 December 2018, LBRUT issued a Negative Screening Opinion confirming that the Local Planning Authority does not consider the Proposed Development requires an Environmental Impact Assessment (EIA) to be submitted as part of the Planning Application.

## Planning Performance Agreement

1.8 This Application is subject to a Planning Performance Agreement agreed with LBRUT.

## 2. Scheme Benefits

2.1 The proposed development will deliver a number of benefits to LBRUT residents. These are discussed in detail in Section 7 of this Planning Statement and summarised below:

- The site is a brownfield out-of-centre retail park where redevelopment represents an opportunity to optimise housing potential without impacting on the borough's designated and non-designated heritage assets.
- LBRUT's current housing target (315 dwellings per annum) will nearly triple to 811 dwellings per annum following the adoption of the draft London Plan. Redevelopment of the site to provide 385 homes (35% of which will be affordable) provides a significant contribution towards meeting the borough's increasing housing target.
- Small scale flexible commercial units are proposed which could accommodate a variety of local scale shops, services, cafes, workspace and community uses.
- In terms of the economic impact of the scheme, it is estimated that the scheme has the potential to support between 10-25 permanent jobs and generate around £6 million in additional household expenditure on food, drink, household goods and services and recreation in the local area.
- The scheme has been designed in a way that is sensitive to the existing surrounding context, whilst establishing a new and coherent legible frontage along Manor Road which improves the relationship between the site and Manor Road itself.
- The scheme introduces new high quality public realm and improves the visual appearance of the area.
- The proposal incorporates a number of zero carbon technologies (such as PV Panels and air source heat pumps) and is capable of meeting the overall carbon reduction targets set out in both the adopted and draft London Plan.
- Due to the low level of car parking proposed as part of the scheme and the reduction in road traffic emissions as a result of the proposed development, the scheme will deliver an air quality benefit and highways benefit when compared to the existing use of the site as a retail warehouse.
- The proposed development is liable to pay the Community Infrastructure Levy and will make a sizable contribution towards the infrastructure listed on the Council's Regulation 123 list.



### 3. Site and Context

- 3.1 The site currently accommodates a retail warehouse unit occupied by Homebase and Pets at Home (use class A1), associated surface car parking and a small bus layby in the north of the site. The retail warehouse is approximately 5,000sqm (GIA) and the car park provides 174 parking spaces.
- 3.2 The site is located in the administrative area of the London Borough of Richmond upon Thames (the local planning authority) approximately 1.1km south of Kew Gardens and approximately 1.6km north of Richmond Park. The Thames is approximately 1.5km to the west. The planning application boundary is shown on the Site Location Plan, enclosed in Appendix B of this Planning Statement.
- 3.3 The site extends to approximately 1.5 hectares and is bound to the north by Manor Road Circus (a roundabout where the A316 and B353 meet), to the east by Manor Road (with residential development and Sainsbury's beyond), to the south and west by the railway (with residential development beyond in both cases). The railway to the south is the South Western Railway main line and the railway to the west is part of the London Overground / Underground network.
- 3.4 The surrounding uses in the area are predominantly residential with some light industrial and retail uses. The closest Conservation Areas to the site are Sheendale Road (to the west) and Sheen Road (southwest of the site). There are a number of Buildings of Townscape Merit in the vicinity of the site (for example along Manor Grove to the east). Refer to the Townscape Visual Impact Assessment for a map showing their location.
- 3.5 The site has a rating of PTAL 5 (Very Good). North Sheen station is approximately 50m to the south-east. Pedestrian, cyclist and vehicular access to the site is from Manor Road.

#### Planning History

- 3.6 The planning history associated with the site relates mainly to the retail warehouse, which was granted planning permission in August 1991 (reference 91/0270/OUT). The planning history confirms the existing lawful use of the site for Class A1 non-food retail/garden centre uses. Permission for the bus depot was approved in May 1992 (reference 91/2243/FUL). A more detailed summary of the relevant planning history is enclosed in Appendix 1.



## 4. Planning Application Specification

- 4.1 This section describes the planning application, the development proposed and the contents of the application. It also outlines the relevant statutory context and explains how the planning application is compliant with the statutes.

### Form of Application

- 4.2 A planning application is submitted seeking full planning permission for development, including the demolition of the existing retail warehouse units on the site (Homebase and Pets at Home). The details of the development are set out within the proposed plans, and are explained below and in the Design and Access Statement.

### Proposed Development

- 4.3 The overarching objective for the Proposed Development is the provision of 385 new residential units and the creation of a new enhanced public realm.
- 4.4 The formal description of development is as follows:

*Demolition of existing buildings and structures and comprehensive residential-led redevelopment of four buildings of between four and nine storeys to provide 385 residential units (Class C3), flexible retail /community / office uses (Classes A1, A2, A3, D2, B1), provision of car and cycle parking, landscaping, public and private open spaces and all other necessary enabling works.*

### Use/amount

- 4.5 The proposed development comprises 385 residential units (use class C3) and 480sqm (GIA) of flexible retail/community/office uses (classes A1, A2, A3, D2, B1).
- 4.6 As part of the application, the Proposed Development includes the demolition of the existing retail warehouse units (Homebase and Pets at Home), which comprise 5,000sqm (GIA) of A1 retail use.
- 4.7 The scheme comprises 153 x 1 bedroom units (40%), 177 x 2 bedroom units (46%) and 55 x 3 bedroom units (14%). It includes 35% on site affordable housing, calculated on a habitable room basis (with a tenure split of approximately 70-30 shared ownership – affordable rent).

### Layout

- 4.8 The layout of the Proposed Development has been designed to address existing development along Manor Road to the east, whilst responding to the constraints of the railways along the western and southern boundaries. For this reason, the tallest part of the development is located towards the centre of the site, away from Manor Road (where proposed height is limited to 4 storeys along the majority of its length).

- 4.9 The site's main entrance (providing pedestrian and cyclist access) faces east towards Manor Road. A secondary entrance for servicing vehicles is located towards the northern boundary of the site (south of the bus depot). This entrance retains the existing vehicular access onto Manor Road.
- 4.10 Full details on the layout are shown on Proposed Layout Plan MNR-AA-ALL-GF-DR-A-2000.

## Access

### *Pedestrians*

- 4.11 The primary pedestrian access to the site is from the east. The proposed landscape scheme has been designed to facilitate this east-west movement as well as movements throughout the site. The shape and placement of the soft landscaping elements in the new square in particular have been designed to maximise pedestrian flow.
- 4.12 Pedestrian access to the site is also possible from the north and south where the site boundary meets Manor Road. A number of pedestrian routes have been planned to ensure permeability through the site as well as connectivity to the surrounding area. The Design and Access Statement contains further detail about pedestrian routes through the site.

### *Cyclists*

- 4.13 Access to the site by bicycle is via Manor Road. 720 new cycle spaces are proposed in the basement below Block A, 120 are proposed at ground floor level within Block C and 64 at ground floor level in Block D. There is a good distribution of cycle spaces across the site in close proximity to the blocks they serve. There are additional cycle spaces in the public realm to serve visitor requirements (24 spaces associated with commercial use and 11 associated with residential use).

### *Vehicles*

- 4.14 Vehicular access to the site is via a service road to the north. The service road runs in a north-south trajectory through the site, directly adjacent to the railway. A tracking plan showing the servicing route through the site is included in the Transport Statement accompanying the planning application.
- 4.15 The proposed development is 'car-free' but includes 12 accessible parking bays and two car club bays. A plan showing where additional accessible bays could be accommodated (if required in the future) is included in the Design and Access Statement.

## Scale

- 4.16 The proposed buildings range in height from 4 storeys to 9 storeys. The height of the proposed buildings along the majority of the Manor Road frontage is 4 storeys. The tallest part of the scheme is located at the centre of the site against the western railway line and the buildings along the southern boundary range in height from four to six storeys.

- 4.17 The following design features help to minimise the perceived scale, ensuring the appropriateness of the proposed building heights:
- Set-backs along the entire Manor Road frontage – the majority of the Manor Road frontage comprises 4 storey buildings with the 4<sup>th</sup> floor set-back, responding positively to the existing low-rise context and respecting neighbouring properties;
  - A green 'buffer' the entire length of the southern boundary – to allow a generous separation distance between the scheme and Manor Park; and
  - Locating the tallest building towards the centre of the site.
- 4.18 The proposed scale, bulk and massing responds to the policy requirement to increase the supply of housing in London and the opportunity to make more efficient use of previously developed land, with optimisation of housing delivery focused in accessible urban locations (such as the Site).

## Appearance

- 4.19 The design of the proposed buildings have been informed by the surrounding context and guided by the following important design objectives:
- Contextually appropriate;
  - Sensitive to the adjacent buildings (particularly the neighbouring residential units); and
  - Enhanced relationship between buildings and public realm.
- 4.20 The principal materials are:
- Brick (light red to reference buildings on Manor Road and a darker greyer brick to reference the buildings within the local conservation areas);
  - Reconstituted stone (a lighter, whiter stone to contrast with selected brickwork and an 'earthy' coloured stone to reference the red brick detailing of the local houses); and
  - Bronze coloured powder coated aluminium (for balustrades, fenestration, doors and commercial frontages).

## Landscaping

- 4.21 A comprehensive landscape scheme is proposed as part of this application, with particular attention on creating a new high quality public realm.
- 4.22 The key elements to the landscape scheme include:
- 113 new planted trees;
  - 1,409sqm of play space;
  - A landscape buffer between the residential units and the railway;
  - A new public square;

- A mix of hard and soft landscaping features following pedestrian desire lines through the site;
- Amenity roof terraces; and
- Green roofs.

4.23 For further details about the landscaping proposed as part of this planning application, refer to the Design and Access Statement.

## Legislative Context

### The Town and Country Planning Act (1990)

4.24 The full planning application is submitted pursuant to the Town and Country Planning Act (1990) As Amended and in accordance with the Town and Country Planning (Development Management Procedure) (England) Order 2015.

## 5. Stakeholder Engagement

### LBRUT Consultation

5.1 The Applicant's team has worked closely with officers at LBRUT and the Greater London Authority (GLA) prior to the submission of this planning application through a series of pre-application meetings that took place between July 2018 and December 2018. The meetings covered a broad range of topics, including the principle of development, transport, environment, design, heritage and access proposals, and the landscape strategy.

5.2 A summary of the key points of discussion at the pre-application meetings with LBRUT were as follows:

- Principle of development – officers supported a more efficient use of the site and a residential-led mixed use redevelopment.
- Height and massing – officers raised concerns regarding the proposed height of the buildings. It was agreed that the height along the Manor Road frontage is acceptable at 4 storeys. Officers also recommended the inclusion of top floor set-backs and stepping up the height towards the centre of the site so that the taller blocks are further from the site boundary.
- Parking – officers recommended removing the originally proposed full basement car parking and suggested that the scheme should be a car free development. A review of Controlled Parking Zones (CPZ) is likely to be required.
- Landscaping and public realm – the Council recommended further work to distinguish between public and private spaces to ensure a clear hierarchy of spaces. Special attention should be afforded to planting and surface treatments. Officers confirmed that space that could be used in the future for accessible parking bays should not form part of the play space provision in the short term.
- Affordable housing – provision of less than policy compliant 50% affordable housing provision and any adjustments to affordable housing tenure mix would need to be fully justified through a financial appraisal.

5.3 In addition to the pre-application meetings with officers, the Applicant also presented the draft scheme to the Design Review Panel (23<sup>rd</sup> October 2018 and 22<sup>nd</sup> January 2019). The Panel responded positively to the idea of introducing legibility into the site through a new public urban square as well as the enclosure of Manor Road with a built frontage. The Panel raised concerns regarding the proposed height of the buildings, but were comfortable with the frontage to Manor Road. With regard to affordable housing, the Panel queried whether the affordable units could be better integrated within the layout in order to achieve a 'tenure blind' scheme. They also recommended further work to distinguish between areas of public and private open space.

### GLA Consultation

5.4 A summary of the key points of discussion at the pre-application meetings with the GLA were as follows:

- Principle of development and land use – officers strongly supported the principle of residential development at the site as well as small-scale commercial uses.

- Landscaping – officers highlighted the play space benchmark of 10sqm per child and noted that, as a minimum, play space for under 5s should be provided on site. The provision of a public square was welcomed, but further thought was required with regard to the uses that flank it and the distinction between public and private spaces.
- Height and massing – officers considered that the height and massing strategy responded positively to the existing low-rise context with the scale dropping down to respect neighbouring properties. Given the high accessibility of the site, officers suggested that there may be scope for increased height to deliver additional homes.
- Parking – officers welcomed a car-free development and required that cycle parking was in line with draft London Plan standards.

### Public Exhibition

- 5.5 The Applicant held a series of public exhibitions at the Holy Trinity Church, Sheen Park. The first round of public exhibitions was held on 6<sup>th</sup>, 10<sup>th</sup> and 20<sup>th</sup> November to present the draft proposals. Before the first exhibition, we were made aware of a Royal Mail issue with the delivery of the invitation letters (in some cases we understand that eight days passed between posting and receipt). The exhibition on 20<sup>th</sup> November was an additional event to give the residents that received their invitation late another chance to view the proposals (the invitations for the 20<sup>th</sup> November were hand-delivered).
- 5.6 A second round of public exhibitions was held at the Holy Trinity Church on 11<sup>th</sup> and 15<sup>th</sup> December to present the amended scheme in more detail prior to the submission of the application. A model of the scheme was on display.
- 5.7 In both rounds of exhibitions, the invitations were delivered to 4,575 households. The exhibitions were very well attended and 227 feedback forms have been received. The main comments related to parking and the height of the scheme. More detail about the consultation feedback is provided in the Statement of Community Involvement.
- 5.8 The Applicant has engaged in constructive pre-application discussions with LBRUT, the GLA and members of the public. The team has given due consideration to the comments received and is satisfied that the proposals are acceptable in planning policy terms for new residential development in a highly sustainable urban location.

## 6. Planning Policy Framework

6.1 This section of the Planning Statement sets out the adopted and emerging national, regional and local planning policy context relevant to the determination of the Planning Application.

6.2 Section 70 of the Town and Country Planning Act 1990 requires regard to be had to material elements of the adopted Development Plan in determining applications. In accordance with Section 38(6) of the Planning and Compulsory Purchase Act (2004), planning applications should be determined in accordance with the Development plan unless material considerations indicate otherwise.

### National

6.3 The National Planning Policy Framework (NPPF), published on 24<sup>th</sup> July 2018, sets out the Government's planning policies for England and how these are expected to be applied. The NPPF is the framework beneath which local and neighbourhood plans will sit and respond to the needs and priorities of local communities.

6.4 The NPPF sets out a presumption in favour of sustainable development (Paragraph 11). The NPPF requires that, in assessing and determining development proposals, local planning authorities should apply the presumption in favour of sustainable development. This means that development which is sustainable should be approved without delay.

6.5 A key component of the revised NPPF is making effective use of land, with a particular focus on significantly boosting the supply of homes and achieving appropriate densities.

6.6 At the same time of the publication of the revised NPPF, updated Planning Practice Guidance ('PPG') was published in respect of viability and housing and economic development needs assessments.

6.7 Material consideration should also be given to the National Planning Policy Framework (NPPF) and associated Planning Practice Guidance (PPG) in decision making.

### The Development Plan

6.8 The relevant adopted Development Plan for the site comprises:

- London Plan (consolidated with amendments since 2011) (2016); and
- London Borough of Richmond upon Thames Local Plan (2018).

6.9 In terms of emerging planning policies, the GLA published the draft London Plan in December 2017, followed by Minor Suggested Changes on 13<sup>th</sup> August 2018. The Examination in Public opened on 15<sup>th</sup> January 2019. In accordance with NPPF Paragraph 48, Local Planning Authorities may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan, the extent to which there are unresolved objections to relevant policies and the degree of consistence with the NPPF.

6.10 The site is not located within a defined Neighbourhood Plan Area.



## Other Relevant Guidance

6.11 The Council has a series of adopted Supplementary Planning Documents (SPDs), including those that are particularly relevant to this planning application listed below:

- Richmond and Richmond Hill Village Planning Guidance (2016);
- Affordable Housing (2014);
- Design Quality (2006);
- Planning Obligations (2014);
- Refuse and Recycling Storage Requirements (2015);
- Residential Development Standards (2010); and
- Sustainable Construction Checklist (2016).

6.12 The GLA also has a series of adopted Supplementary Planning Documents (SPDs), including those that are particularly relevant to this planning application listed below:

- Affordable Housing and Viability (2017);
- Housing (2016);
- Accessible London: Achieving an Inclusive Environment (2014);
- Play and Informal Recreation (2012);
- Use of planning obligations in the funding of Crossrail and the Mayoral Community Infrastructure Levy (2013); and
- Sustainable Design and Construction (2014).

## Site Specific Policies

6.13 The site is not allocated for development in the adopted Local Plan. However, the Sainsbury's site to the east of Manor Road is allocated for comprehensive redevelopment for retail and residential uses. The continued use of the Sainsbury's site as a foodstore and the re-provision of the existing retail floorspace are also required.

## Policy Designations

6.14 Although the Local Plan was adopted in July 2018, the Council's website confirms that the existing Policies Map (2015) and its designations will be retained until it is updated 'in 2019' to reflect the adopted Local Plan (2018). There is currently no updated programme.

6.15 The site is not subject to any site specific designations on the adopted Policies Map (2015). However, land adjacent to the site is subject to the following designations:

- Local distributor road (Manor Road to the east);
- Other Open Land of Townscape Importance (land to the east, beyond Manor Road);

- Proposed area for tree planting (land to the west, beyond the railway);
- Conservation Area (land to the west and south-west, beyond the railway);

### Relevant Development Management Policies

- 6.16 The Local Plan, London Plan and draft London Plan provide a comprehensive package of development management policies relevant to the planning application scheme. These policies should be read alongside the NPPF and PPG, and afforded varying weight in decision making in line with the principles of NPPF paragraph 48.
- 6.17 The paragraphs below set out the main policies relevant to the Proposed Development according to the Development Plan document:

#### *London Plan (2016)*

- **Policy 3.3 (Housing Supply)** – sets a minimum target of 315 dwellings per annum for the London Borough of Richmond upon Thames.
- **Policy 3.4 (Optimising Housing Potential)** – requires developments to optimise housing output in accordance with the relevant density range (200-700 habitable rooms per hectare for an ‘urban’ setting in PTAL 4-6).
- **Policy 3.5 (Quality and design)** – requires development to enhance the quality of local places, taking into account context, character and density and sets minimum internal space standards for residential units.
- **Policy 3.8 (Housing choice)** – seeks a range of housing choices in terms of mix and type and requires that 90% of dwellings meet Building Regulation requirement M4(2) ‘accessible and adaptable dwellings’ and 10% meet M4(3) ‘wheelchair user dwellings’.
- **Policy 3.6 (Play space)** – requires all proposals for housing to make provision for play and informal recreation based on the standards in the Mayor’s Play and Informal Recreation SPG.
- **Policy 3.11 (affordable housing)** – 60% of the affordable housing provision should be for social/affordable rent and 40% for intermediate rent/sale.
- **Policy 4.7 (Retail)** – requires boroughs to manage existing out of centre retail development in line with the sequential approach.
- **Policy 4.8 (Successful retail sector)** – supports additional local convenience shopping and services at an appropriate scale in locations accessible by walking, cycling and public transport to serve existing or new residential communities.
- **Policy 7.7 (Tall buildings)** – tall buildings should relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm. They should incorporate the highest standards of architecture and materials and not affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing, noise etc.
- **Policy 6.9 (Cycling)** - sets minimum cycle parking standards. For long-stay, 1 space per 4 FTE staff and 1 space per 20 FTE students. For short-stay, 1 space per 7 FTE students.

- **Policy 6.13 (Car parking)** – sets a maximum of less than 1 parking space per 1/2 bedroom unit and up to 1.5 per unit for 3 beds.
- **Policy 7.5 (Public Realm)** – requires landscape treatment, street furniture and infrastructure to be of the highest quality with a clear purpose and to contribute to the easy movement of people through the space. Treatment of the public realm should be informed by the heritage values of the place.
- **Policy 7.6 (Architecture)** – buildings should be of the highest architectural quality, and be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm. They should not cause unacceptable harm to the amenity of surrounding land and buildings in relation to privacy and overshadowing.

#### ***Richmond Local Plan (2018)***

- Policy LP1 (Local Character and Design Quality)
- Policy LP2 (Building Heights)
- Policy LP3 (Designated Heritage Assets)
- Policy LP4 (Non-designated Heritage Assets)
- Policy LP8 (Amenity and Living Conditions)
- Policy LP10 (Local Environmental Impacts, Pollution and Land Contamination)
- Policy LP11 (Subterranean Development and Basements)
- Policy LP15 (Biodiversity)
- Policy LP16 (Trees, Woodland and Landscape)
- Policy LP17 (Green Roofs and Walls)
- Policy LP20 (Climate Change Adaptation)
- Policy LP21 (Flood Risk and Sustainable Drainage)
- Policy LP22 (Sustainable Design and Construction)
- Policy LP23 (Water Resource and Infrastructure)
- Policy LP24 (Waste Management)
- Policy LP27 (Local Shops, Services and Public Houses)
- Policy LP28 (Social and Community Infrastructure)
- Policy LP30 (Health and Wellbeing)
- Policy LP31 (Public Open Space, Play Space, Sport and Recreation)
- Policy LP34 (New Housing)
- Policy LP35 (Housing Mix and Standards)
- Policy LP36 (Affordable Housing)
- Policy LP37 (Housing needs of Different Groups)
- Policy LP39 (Infill, Backland and Backgarden Development)

- Policy LP40 (Employment and Local Economy)
- Policy LP44 (Sustainable Travel Choices)
- Policy LP45 Parking Standards and Servicing)

#### ***Draft London Plan (2018)***

- **Policy H1 (Increasing Housing Supply)** – seeks to optimise the potential for housing delivery on all suitable and available brownfield sites (including sites in PTAL 3-6 and low-density retail parks or car parks). Sets an annual housing target for LBRUT of 811 dwellings.
- **Policy D6 (Optimising housing density)** – development proposals must make the most efficient use of land and be developed at the optimum density (taking into account site context and PTAL).
- **Policy D4 (Housing quality)** – proposals should meet the minimum internal space standards and private outside space.
- **Policy H12 (Housing size mix)** – the unit mix should have regard to the nature and location of the site.
- **Policy D5 (Accessible housing)** – at least 10% of housing to meet Building Regulation requirement M4(3) ‘wheelchair user dwelling’ and 90% M4(2) ‘accessible and adaptable dwelling’.
- **Policy H5 (Affordable housing)** – the strategic target is for 50% of all new homes to be affordable.
- **Policy H6 (Threshold approach)** – to follow the Fast Track Route application must meet or exceed the threshold level of affordable housing on site without public subsidy (35%).
- **Policy H7 (Affordable housing tenure)** – the following split should be applied to development: 30% Social Rent or London Affordable Rent, 30% London Living Rent or London Shared Ownership and 40% to be determined by the borough.
- **Policy E9 (Retail)** – boroughs should manage existing out of centre by encouraging comprehensive redevelopment.
- **Policy D8 (Tall buildings)** – requires consideration of the visual, environmental and functional impacts of a tall buildings.
- **Policy T5 (Cycling)** – sets minimum cycle parking standards. For long-stay, 1 space per 4 FTE staff and 1 space per 20 students. For short-stay, 1 space per 7 FTE students.
- **Policy T6 (Car Parking)** – car-free development should be the starting point for all proposals that are well-connected by public transport. Provision should be made for electric or other Ultra-Low Emission vehicles.
- **Policy T6.1 (Residential parking)** – for sites in PTAL 5-6, development should be car-free. 20% of spaces should have active charging facilities with passive provision for the remaining spaces. Proposals should provide at least one designated disabled bay per dwelling for 3% of dwellings from the outset and demonstrate on a plan where the remaining bays (totalling 10% could be provided in the future.
- **Policy T6.5 (Non-Residential Disabled Persons Parking)** – requires 5% of parking to be designated for disabled users and 5% to be enlarged bays.

- **Policy D1 (London's form)** – proposals should use land efficiently by optimising density, delivering appropriate outlook, privacy and amenity, and providing active frontages. Design should respond to local context with buildings that are positioned and of a scale, appearance and shape that responds successfully to the identity of the locality.
- **Policy D7 (Public Realm)** – requires safe, accessible, inclusive, attractive, well-connected, easy to understand and maintain public realm that relates to the local and historic context and incorporates the highest quality design, landscaping, planting, street furniture and surfaces. The design of the building should activate and define the public realm and provide natural surveillance.

## 7. Planning Assessment

7.1 This section assesses the Proposed Development against the relevant national, strategic and local planning policies:

- Demolition;
- Principle of Development;
- Commercial Land Use;
- Residential Land Use;
- Heritage and archaeology;
- Townscape and Visual Impact;
- Flooding and Drainage;
- Design and Landscape;
- Access and Transport;
- Ecology;
- Arboricultural Impact;
- Air Quality;
- Noise;
- Wind Microclimate;
- Daylight/Sunlight;
- Health Impact;
- Energy and Sustainability;
- Contamination;

### Demolition

7.2 The existing building is not statutorily or locally listed, nor is it located in a Conservation Area. Out of centre retail uses are not subject to policy protection. The principle of demolition is acceptable.

### Principle of Development

#### *Policy Summary*

7.3 NPPF Paragraph 117 promotes an 'effective use of land in meeting the needs for homes and other uses' and Paragraph 118 requires boroughs to give 'substantial weight' to the value of using suitable brownfield land within settlements for homes.

- 7.4 London Plan Policy 3.3 encourages boroughs to realise brownfield housing capacity to supplement their housing targets through mixed use redevelopment (especially of surplus commercial land). Similarly, draft London Plan Policy H1 seeks to optimise the potential for housing delivery on all suitable and available brownfield sites (including sites in PTAL 3-6 and low-density retail parks or car parks).
- 7.5 Paragraph 3.1.17 of the Local Plan explains that the Council's Spatial Strategy for the provision of new housing is through redevelopment and maximising the use of brownfield sites.

#### *Assessment*

- 7.6 The site comprises previously developed land in an accessible urban area (PTAL 5). The principle of development on the site is therefore supported by planning policy at all levels. The GLA's pre-app letter, dated 21<sup>st</sup> January 2019, confirms that the principle of development is acceptable and that the redevelopment of the existing low-density retail unit and car parking for a new residential led scheme is supported. A copy of the pre-app letter is included in Appendix C.

### **Commercial Land Use**

#### *Policy Summary*

- 7.7 NPPF Paragraph 121 encourages local planning authorities to take a positive approach to applications for alternative uses of land, which is currently developed but not allocated for a specific purpose, where this would help to meet identified development needs (particularly the use of retail land for homes in areas of high housing demand).
- 7.8 London Plan Policy 4.7 requires that boroughs manage existing out of centre retail development in line with the sequential approach, seeking to reduce car dependency. And, as previously mentioned, London Plan Policy 3.3 encourages boroughs to realise brownfield housing capacity to supplement their housing targets through mixed use redevelopment (especially of surplus commercial land).
- 7.9 Draft London Plan Policy E9 requires boroughs to manage existing out of centre retail by encouraging 'comprehensive redevelopment' for a diverse mix of uses in accordance with other draft policies, including Policy SD8. Draft Policy SD8 encourages proposals to realise the full potential of existing out of centre retail parks to deliver housing intensification through redevelopment. It notes that this should not result in a net increase in retail floorspace in out-of-centre locations.
- 7.10 With reference to new retail development, Local Plan Policy 27 states that where there is no existing centre within reasonable walking distance (400m), a new shop or shops may be required as part of a new housing development.
- 7.11 Local Plan Policy LP28 seeks to ensure adequate provision of community services and facilities and supports new social and community infrastructure where it provides for an identified need, is of a high quality and is provided in flexible adaptable buildings. Local Plan Policy LP41 encourages smaller scale office development in suitable locations.

#### *Assessment*



- 7.12 The existing use of the site is A1 retail. The site is not located in the town centre and there is no specific policy that protects against the loss of retail floorspace in this location. Indeed, London Plan Policy 4.7 requires that boroughs manage existing out of centre retail development in line with the sequential approach and draft London Plan policies E9 and SD8 actively encourage 'comprehensive redevelopment' of existing out of centre retail parks.
- 7.13 In accordance with national and regional policy, the proposals realise the full potential of this out of centre retail park to deliver housing intensification through redevelopment.
- 7.14 There are no local centres in close proximity to the site and therefore the new commercial units assist in the delivery of local scale shops and services. In accordance with Local Plan Policy LP27, such provision assists those less mobile and the elderly to have improved access to facilities and also provide social/community services for the new residents. The location is considered to be particularly suitable for retail and commercial uses taking account of the high public accessibility of the site.
- 7.15 The 480sqm of flexible non-residential uses constitutes three small scale units, the largest of which is 202sqm. These units will help activate the Manor Road frontage, draw people into the new public square and help to create a sense of place and community in the new development. The three small scale units will not compete with existing centres – they are intended to serve residents in the new housing development and immediate neighbours. As such no adverse retail impacts are associated with the proposed development.
- 7.16 The proposals are for flexible A1, A2, A3, D2 and B1 uses, ensuring sufficient flexibility to accommodate a range of occupiers. In accordance with Local Plan policies LP27, LP28 and LP41, which require applications to meet the needs arising from the proposed development. The proposed development incorporates sufficient space for non-residential uses that is flexible for future local needs that might arise, as well as providing enhanced local provision of small scale shops, cafés, workspace or community uses.

## **Residential Development and Affordable Housing**

### *Policy Summary*

- 7.17 NPPF Paragraph 59 supports the Government's objective of 'significantly boosting' the supply of homes by ensuring a sufficient amount and variety of land can come forward where it is needed. London Plan Policy 3.3 requires LBRUT to exceed its minimum target of 315 units per year and encourages boroughs to realise brownfield housing capacity. Draft London Plan Policy H1 proposes to nearly triple this target to 811 dwellings per annum. To ensure that ten-year housing targets are achieved, Draft London Plan Policy H1 encourages development on other appropriate windfall sites not identified in Development Plans through the Plan period. The policy also encourages boroughs to optimise the potential for housing delivery on all suitable and available brownfield sites, especially sites with existing PTALs 3-6 and low-density retail parks or car parks. At the local level, Local Plan Policy LP34 seeks to deliver 3,150 new homes in the period 2015 – 2025 (until this is replaced by a revised London Plan target) and states that the Council will exceed the minimum strategic dwelling requirement.
- 7.18 By way of context, Richmond's housing delivery rate over the past five years (2013/14 – 2017/18) is an average of 374 units per annum. According to the Housing Land Financial Year Report (2017/18), LBRUT has a 5.5 year land supply (based on the housing target in the adopted London Plan).

- 7.19 In terms of development density, London Plan Policy 3.4 requires developments to optimise housing output in accordance with the relevant density range in the Sustainable Residential Quality Density Matrix. The target density range identified is for between 200-700 habitable rooms per hectare (or between 45-260 units per hectare) for an 'urban' setting in PTAL 4-6 (London Plan Table 3.2). Draft London Plan Policy D6 seeks to encourage schemes to optimise development and therefore seeks to introduce less stringent density maximums. Draft Policy D6 therefore only requires proposals delivering more than 405 units per hectare in areas in PTAL 4-6 to be subject to particularly design scrutiny requirements. Local Plan Policy LP1 requires that development is compatible with local character, which includes density.
- 7.20 With reference to housing mix, London Plan Policy 3.8 encourages new developments to offer a range of housing choices (in terms of the mix of housing sizes and types), including the provision of affordable family housing. Local Plan Policy LP35 encourages developments to provide family sized accommodation, but notes that the housing mix should be appropriate to the site-specifics of the location. There is no specific local target for unit size mix.
- 7.21 In respect of affordable housing, NPPF Paragraph 64 encourages LPAs to expect at least 10% of the homes delivered on major sites to be available for affordable home ownership. Draft London Plan Policy H5 sets a strategic target for 50% of all new homes delivered in London to be genuinely affordable, and advocates the threshold approach to providing affordable housing. The threshold approach is supported in the Mayor's Affordable Housing and Viability SPG (2017) and draft London Plan Policy H6, which sets a threshold level of affordable housing set at 35% to qualify for the Fast Track Route. In order to follow the Fast Track Route, applications must: meet or exceed 35% affordable housing on site without public subsidy; be consistent with the relevant tenure split; meet other relevant policy requirements; and demonstrate that they have sought grant to increase the level of affordable housing. Developments which qualify for the Fast Track Route are not required to provide a viability assessment at application stage.
- 7.22 Local Plan Policy LP36 sets a local target of 50% of all housing units to be affordable housing. Where provision of affordable housing is less than 50% on economic viability grounds, Applicants are required to submit a Financial Viability Assessment to demonstrate that the maximum reasonable amount of affordable housing is being delivered.
- 7.23 London Plan Policy 3.11 sets an affordable housing tenure split requirement of 60% of the affordable housing provision to be for social/affordable rent and 40% for intermediate rent/sale. The draft London Plan Policy H7 requires 30% as Social Rent or London Affordable Rent, 30% as London Living Rent or London Shared Ownership and 40% to be determined by the borough.
- 7.24 Local Plan Policy LP36 seeks a tenure split of 80% for rent and 20% affordable intermediate housing. The policy requires that the affordable housing mix reflects the need for larger rented family units.

#### *Assessment*

- 7.25 In accordance with policy at all levels, which supports the provision of residential development and the optimisation of the potential for housing delivery on all suitable and available brownfield sites, the application proposes 385 new residential units. London Plan Policy 3.3 requires that LBRUT exceeds its target of 315 residential units per year and draft London Plan Policy H1 nearly triples this target, requiring LBRUT to

deliver a minimum of 811 units per year. The proposed development will contribute significantly to meeting LBRUT's housing targets.

7.26 The application site is located in a highly accessible urban location, where policy encourages the optimisation of site capacities and higher density development. The development density is 587 habitable rooms per hectare (or 214 units per hectare), in accordance with London Plan Policy 3.4.

7.27 In accordance with London Plan Policy 3.8 and Local Plan Policy LP35, which seek a range of housing choices, the proposal comprises 40% 1 bedroom units, 46% 2 bedroom units and 14% 3 bedrooms units (see Table 7.1 below). All the two bedroom units are able to accommodate up to four people, meaning that 60% of the units in the scheme can be considered family units. This mix is appropriate to the site-specifics of the location (an accessible urban location) and also provides a good proportion of family units.

**Table 7.1 – Housing Mix**

	1 bed	2 bed	3 bed	Total
Total	153 (40%)	177 (46%)	55 (14%)	385

7.28 The scheme includes the provision of 35% affordable housing and therefore, in accordance with the draft London Plan Policy H6 and the Affordable Housing and Viability SPG, meets the criteria for the GLA Fast Track Route. Notwithstanding this, the scheme does not meet LBRUT's Local Plan target for 50% affordable housing, and therefore the application is accompanied by a Financial Viability Assessment (FVA) which demonstrates that the scheme delivers the maximum reasonable amount of affordable housing. The FVA demonstrates the scheme is not able to support a policy compliant level of affordable housing viably, however, the client is willing to take a commercial view to proceed with the proposed level of affordable housing.

7.29 The proposed affordable housing mix is shown in Table 7.2 below and includes a high proportion of affordable family-sized units for affordable rent (in accordance with Local Plan Policy LP36). The tenure split is approximately 70-30 between shared ownership and affordable rent.

**Table 7.2 – Affordable Housing Mix**

	1 bed	2 bed	3 bed	Total
Affordable Rent	6	13	21	40
Shared Ownership	46	48	0	94
Total	52	61	21	134

- 7.30 The shared ownership units are within the affordability thresholds set out by the GLA's affordability criteria with the one bedroom apartments requiring an annual income of c.£67,000 whilst the two bedroom apartments are below the £90,000 threshold at approximately £81,000. The values of the shared ownership units are 50% of market rates.
- 7.31 The Affordable Rent units are based on Richmond Affordable Rents, which would result in annual rental charges for the occupier of between a 25% discount on one beds and 60% discount on three beds on market levels. The provision of 35% affordable housing on site is a significant public benefit to be delivered by this scheme and, if approved, the proposed development would provide for approximately 14% of the borough's annual housing need (which, according to the SHMA (2016), is 964 affordable homes per annum).

## **Residential Quality and Amenity**

### *Policy Summary*

- 7.32 The Mayor's Housing SPG (2016) requires that all new development complies with the Nationally Described Space Standard and comprises adequate amenity space this requirement is also reflected in Local Plan Policy LP35. London Plan Policy 3.5 requires housing developments to be of the highest quality internally and externally and encourages LPAs to ensure new developments reflect minimum space standards. The Mayor's Housing SPG (2016) also sets out a series of additional standards to ensure high quality residential dwellings and amenity space (including wheelchair accessible dwellings, communal amenity, private amenity, public open space, playspace, cycle storage, car parking and space standards).
- 7.33 The Mayor's Housing SPG requires a minimum of 5sqm of private outdoor space for 1-2 person dwellings and an extra 1sqm for each additional occupant. At the local level, Local Plan Policy LP35 requires that all new housing developments have adequate external amenity spaces and that the spaces are private, useable, functional, safe, easily accessible from living areas, oriented to take account of the need for sunlight, and of sufficient size for the number of occupants.
- 7.34 The Mayor's Housing SPG encourages developments to minimise the number of single aspect dwellings and seeks to avoid single aspect north-facing dwellings.
- 7.35 London Plan Policy 3.8 requires that 90% of dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings' and 10% meet M4(3) 'wheelchair user dwellings'. Local Plan Policy LP35 also requires 90% of all new housing to meet M4(2) and 10% to meet M4(3) access requirements.

### *Assessment*

- 7.36 The application proposes a high standard of residential accommodation. All units comply with the minimum space standards and include adequate external amenity spaces, in accordance with London Plan Policy 3.5 and Local Plan Policy LP35. The external amenity spaces have been tested for wind microclimate and overshadowing to ensure that a high standard of amenity can be achieved.
- 7.37 In accordance with the Play and Recreation SPG (2012), the doorstep play requirements for children aged 0-11 are met on site (at a rate of 10sqm per child). Following consideration of the existing available play and recreation facilities for older children (aged 12+) in the local area, and identification of a number of existing

facilities within the recommended travel distances from the site, 'Neighbourhood Play' is not provided on site. The Play Strategy is covered in more detail in the Design and Access Statement.

- 7.38 In order to ensure a high standard of residential accommodation across the site, and in accordance with the Mayor's Housing SPG, there are no single aspect north-facing units proposed within the scheme. A high proportion of the units are dual aspect - 58% (or 68% when apartments with bay windows are included).
- 7.39 In accordance with London Plan Policy 3.8 and Local Plan Policy LP35, 90% of dwellings will meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings' and 10% will meet M4(3) 'wheelchair user dwellings'.

## **Heritage and Archaeology**

### *Policy Summary*

- 7.40 NPPF Paragraph 189 encourages local planning authorities to request a description of the significance of any heritage assets affected by a proposal, including any contribution made by their setting. In determining planning applications, Paragraph 192 encourages local planning authorities to take account of the desirability of new development making a positive contribution to local character and distinctiveness.
- 7.41 Paragraph 193 requires great weight to be given to the asset's conservation, irrespective of whether any potential harm amounts to substantial harm or less than substantial harm, and Paragraph 194 requires a 'clear and convincing' justification for any harm to the significance of a heritage asset.
- 7.42 Paragraphs 195 and 196 set out clear advice to planning authorities determining applications that lead to 'substantial harm to (or total loss of significance of) a designated heritage asset' or less than substantial harm'. Where a development would lead to 'less than substantial harm' of a designated heritage asset, Paragraph 196 advises local planning authorities to weigh this harm against the public benefits of the proposal.
- 7.43 With reference to non-designated assets, Paragraph 197 requires that the effect of an application on the significance of the asset is taken into account in determining the application. 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.
- 7.44 London Plan Policy 7.8 and draft London Plan Policy HC1 require that development affecting heritage assets and their settings conserves their significance by being sympathetic to their form, scale, materials and architectural detail.
- 7.45 At the local level, Policy LP2 seeks to preserve and enhance the borough's heritage assets, their significance and setting and Local Plan Policy LP3 requires development to conserve and, where possible, make a positive contribution to the historic environment. Policy LP4 relates specifically to non-designated heritage assets and seeks to preserve (and where possible enhance) their significance, character and setting. This includes Buildings of Townscape Merit. Local Policy LP5 seeks to protect the quality of views, vistas, gaps and skyline which contribute to character, distinctiveness and quality of the local and wider area.

### *Assessment*

- 7.46 In accordance with Paragraph 189 of the NPPF, the Heritage Statement accompanying this planning application assesses the impact of the Proposed Development on the significance of heritage assets and their setting.
- 7.47 Although the site does not contain any designated or non-designated heritage assets and is not located in a Conservation Area, the Sheendale Road Conservation Area is located to the north-west of the site and the Sheen Road Conservation Area is to the south-west. In addition, there are a number of buildings of Townscape Merit in the vicinity of the site and Kew Gardens (a World Heritage Site) is to the north. A plan showing the location of these heritage assets is contained in the Heritage Statement.
- 7.48 In accordance with planning policy at all levels, the Heritage Statement concludes that the proposal sustains the significance of all the designated and non-designated assets in the study area. The proposed development will have a negligible impact on the heritage assets within this part of Richmond and Sheen and a minor positive impact on the setting of the Buildings of Townscape Merit at Manor Place. Overall, the proposed development does not lead to any harm to the significance of these assets and, as a result, the NPPF test of weighing 'less than substantial harm' against public benefits does not apply.
- 7.49 With reference to archaeological impact, the site is not located within an Archaeological Priority Area. The Archaeological Desk Based Assessment concludes that the site has limited archaeological potential and that it is considered unlikely that the proposed development would have a significant or widespread below ground archaeological impact. No further mitigation measures are recommended.

## **Townscape and Visual Impact**

### *Policy Summary*

- 7.50 The NPPF sets out the government's aspiration for well-designed places. Paragraph 124 explains that good design is a key aspect of sustainable development and that the creation of high quality buildings and places is fundamental to what the planning process should achieve. Paragraph 127 requires that developments are 'visually attractive' and sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing appropriate innovation or change (such as increased densities).
- 7.51 London Plan Policy 7.4 states that buildings, streets and open spaces should provide a high quality design response that contributes to a positive relationship between the urban structure and natural landscape features and is informed by the surrounding historic environment. Draft London Plan Policy D7 also requires proposals to relate to the local and historic context and incorporate the highest quality design, landscaping, planting, street furniture and surfaces.
- 7.52 Local Plan Policy LP2 requires new buildings to respect and strengthen the setting of the borough's valued townscapes and landscapes through appropriate building heights. Proposals that are taller than the surrounding townscape must be of 'high architectural design quality and standards, deliver public realm benefits and have a wholly positive impact on the character and quality of the area.' Policy LP5 seeks to protect the quality of the views, vistas, gaps and the skyline by resisting development that interrupts or detracts from strategic and local vistas, views, gaps and the skyline.

### *Assessment*

- 7.53 The Richmond and Richmond Hill Village Panning Guidance identifies the site as being with 'Character Area 6: Old Gas Works'. This Character Area is described as having 'no coherent frontage' with an 'irregular, adhoc character due to its industrial past'.
- 7.54 The Townscape and Visual Impact Assessment (TVIA) addresses the impact of the proposed development on 'townscape' receptors and 'visual' receptors during both the construction phase and operational phase of the development. The TVIA notes that there will be temporary, localised effects during the construction phase on both 'townscape' and 'visual' receptors. However, these effects will be short-lived and temporary in nature.
- 7.55 For the operational phase, the TVIA assesses the impact of the proposals on eight Townscape Character Areas (TCAs) and 12 representative views, which have been agreed with LBRUT during pre-app discussions. Of the eight TCAs, the TVIA concludes that one will experience a 'moderate/ beneficial' effect, three will experience a 'minor/ neutral' effect and four will experience a 'negligible/ neutral' effect. Overall, the TVIA concludes that the proposal enhances the townscape character and visual appearance of this area of Richmond, providing high quality architecture that improves legibility within the wider townscape.
- 7.56 Of the 12 representative views, five will experience either a 'minor' or 'moderate' beneficial effect and the remainder will either experience no effect, a 'negligible/ neutral' or a 'moderate/ neutral' effect. Overall, the TVIA concludes that the scheme will not adversely affect any views of importance or the visual appearance of the local area.
- 7.57 It is important to consider that the existing site does not provide any frontage along Manor Road and has an irregular, adhoc character. The proposed development, with a new coherent frontage to Manor Road, will create a more legible environment and improve the relationship between Manor Road and the site.

## **Flooding and Drainage**

### *Policy Summary*

- 7.58 The aim of planning policy at all levels, as set out in the NPPF (2018), London Plan (2016) and Local Plan (2018), is to steer new development to areas with the lowest probability of flooding. When determining applications, NPPF Paragraph 163 requires local planning authorities to ensure that flood risk is not increased elsewhere. Development should be allowed in areas at risk of flooding where it can be demonstrated that:
- Within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;
  - The development is appropriately flood resistant and resilient;
  - It incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;
  - Any residual risk can be safely managed; and
  - Safe access and escape routes are included where appropriate, as part of an agreed emergency plan.



- 7.59 London Plan Policy 5.13 encourages the use of SuDS and seeks to achieve greenfield run-off rates in accordance with a 'drainage hierarchy'. Similarly, draft London Plan Policy SI13 also seeks to achieve greenfield run-off rates in accordance with a 'drainage hierarchy', where a combination of green and brown roofs is highest.
- 7.60 Local Plan Policy LP21 requires that developments avoid or minimise contributing to all sources of flooding, taking account of climate change and without increasing the risk of flooding elsewhere. It seeks a reduction in surface water discharge to greenfield run-off rates wherever feasible (and, where not feasible, a 50% attenuation of the sites surface water runoff a peak times based on the levels existing prior to development). Policy LP23 requires developers to ensure there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to support the development.

#### *Assessment*

- 7.61 The site is located within Flood Zone 1 and the Sequential Test and Exception Test are not required.
- 7.62 The Flood Risk Assessment accompanying the planning application demonstrates that there is an acceptable flood risk from all sources, with the exception of surface water flooding.
- 7.63 To address the risk of surface water flooding, the proposal is to mimic the existing drainage regime, using infiltration techniques. However, this is subject to confirmation of suitable infiltration rates. If infiltration is found not to be possible, a connection to the public sewer network is proposed (alongside blue/green roofs and below ground tanks to attenuate the site to existing greenfield runoff rates, in accordance with London Plan Policy 5.13, draft London Plan Policy SI13 and Local Plan Policy LP 21).
- 7.64 A combination of SuDS has been proposed, including rainwater harvesting, green and blue roofs, infiltration systems (subject to confirmation of suitable infiltration rates), attenuation tanks (for storage or infiltration), propriety treatment systems and landscaping. These measures ensure that the proposals do not affect flood risk elsewhere. Under the proposed development, there will be a net increase in the amount of soft landscaping through the reduction of tarmac throughout the site. The inclusion of extensive green roofs with blue roof storage will further manage runoff close to source and allow for rainwater to be managed through transpiration for low severity storm events, improving the existing drainage regime. Infiltration systems will manage runoff within the site dealing with surface water runoff at the top level of the drainage hierarchy.
- 7.65 Further information is available in the Flood Risk Assessment accompanying this application.

### **Access and Transport**

#### *Policy Summary*

- 7.66 NPPF Paragraph 108 seeks to ensure that 'appropriate opportunities' to promote sustainable transport modes can be taken up (taking account of the type of development and its location), safe and suitable access can be achieved and any significant impacts on the transport network (in terms of capacity and congestion) can be mitigated to an acceptable degree.
- 7.67 Paragraph 110 encourages applications for development that give 'priority first' to pedestrian and cycle movements and states that, amongst other aspirations, development should 'create places that are safe,

secure and attractive' and minimise the scope for conflicts between pedestrians, cyclists and vehicles. Paragraph 109 notes that development should only be prevented 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.

- 7.68 NPPF Paragraph 111 requires all developments that generate significant amounts of movement to provide a Travel Plan and Transport Assessment so that the likely impacts of the proposal can be assessed.
- 7.69 London Plan Policy 6.9 sets minimum cycle parking standards. For residential (C3 use), the policy requires 1 long-stay space per 1 bedroom unit and 2 spaces for all other dwellings. For short-stay, the policy requires 1 space per 40 dwellings. London Plan Policy 6.13 sets a maximum of less than 1 car parking space per 1 or 2 bedroom unit and up to 1.5 per unit for 3 beds.
- 7.70 Draft London Plan Policy T5 also sets minimum cycle parking standards. For residential (C3 use), the policy requires 1 long-stay space per studio, 1.5 spaces per 1 bedroom unit and 2 spaces for all other dwellings. For short stay, the policy requires 1 space per 40 dwellings. Draft London Plan Policy T6.1 requires all areas of PTAL 5-6 to be car free.
- 7.71 At the local level, Local Plan Policy LP44 promotes safe, sustainable and accessible transport solutions. New development should maximise permeability through the provision of safe and convenient walking and cycling routes. Local Plan Policy LP45 requires parking for vehicles and cycles in accordance with the standards in Appendix 3 of the Local Plan (which requires parking in accordance with the London Plan for sites in PTAL 4-6). The policy notes that car-free housing may be appropriate in areas with high public transport accessibility (such as PTAL 5 or 6) subject to the provision of disabled parking, appropriate servicing arrangements and demonstrating that proper controls can be put in place to ensure the proposal will not contribute to on-street parking stress in the locality. All proposals for car free housing must be supported by a Travel Plan.

#### *Assessment*

- 7.72 Although the proposal will not generate the 'significant amounts of movement' referenced in NPPF Paragraph 111, the planning application is supported by a Transport Assessment. The application is also accompanied by a Travel Plan.
- 7.73 Access to the site remains in its current position. A summary of the access and servicing strategy for the Proposed Development is provided in Section Four of this Planning Statement but is explained in more detail in the accompanying Transport Assessment/ Delivery Servicing Management Plan. The Transport Assessment demonstrates that the proposed development will result in a reduction of traffic movements in the AM and PM peak when compared to the existing use of the site, which is heavily trafficked due to retail deliveries and store customers.
- 7.74 In accordance with draft London Plan Policy T6.1 and the Local Plan, the proposal is a car-free development. With reference to the impact of the proposed development on surrounding streets, and the ability of existing residents to park, the Transport Assessment includes a Parking Stress Survey. The Transport Assessment notes that parking stress levels are between 62% and 63% and recommends amending and extending the existing Controlled Parking Zones adjacent to the site in order to mitigate the impact of the

development on the ability of existing residents to park. It is intended that the extension to the Controlled Parking Zone is controlled via a Section 106 agreement (and is included in the Section 106 draft Heads of Terms in Section 7 of this Planning Statement).

- 7.75 As requested by the GLA, and in accordance with draft London Plan Policy T6.1, 12 blue badge car parking spaces will be provided on site (3% provision) and a plan is included in the Design and Access Statement to show how 10% provision (39 spaces) could be accommodated on-site if later required. The plan shows that the future parking could be provided in areas that are currently proposed as lawn (in the southern corner of the site) and some paved circulation space in the secondary public space between buildings B, C and D. None of these spaces are formally included in the site's amenity provision, although it is possible for them to be used as amenity space if or until they are required for additional parking.
- 7.76 Two car club bays will be provided on site and managed by a Car Parking Management Plan, which can be secured by condition. In accordance with London Plan Policy 6.13 and draft London Plan Policy T6.1, two parking bays (the car club bays) will have electric vehicle charging points.
- 7.77 In accordance with Local Plan Policy LP44, which encourages access by sustainable modes of transport, 840 long-stay and 35 short-stay cycle spaces will be provided on site. This exceeds the draft London Plan requirements.
- 7.78 The Air Quality Assessment concludes that, due to the low level of car parking proposed as part of the scheme and the reduction in road traffic emissions as a result of the proposed development, there will be an air quality benefit.
- 7.79 The CEMP accompanying this planning application sets out the proposed construction vehicle routes. These (as well as other construction traffic mitigation measures) can be secured by an appropriately worded planning condition.
- 7.80 The Transport Assessment concludes that the proposed development is acceptable in transport planning terms, that suitable access can be achieved, and that there will be no significant transport impacts as a result of the proposed development as the scheme will result in a reduction of traffic compared to the existing use.

## Ecology

### *Policy Summary*

- 7.81 One of the ways the NPPF seeks to enhance the natural environment is by minimising impacts on, and providing net gains for, biodiversity (Paragraph 170). Paragraph 175 encourages opportunities to incorporate biodiversity improvements in and around developments.
- 7.82 Similarly, London Plan Policy 7.19 requires that, where possible, proposals make a positive contribution to the protection, enhancement, creation and management of biodiversity. Draft London Plan Policy G6 also requires that biodiversity enhancement is considered from the start of the development process.
- 7.83 At the local level, Local Plan Policy LP15 seeks to protect and enhance the borough's biodiversity. The policy supports enhancements to biodiversity and requires major developments to deliver a new gain for

biodiversity through incorporation of ecological enhancements. Harm to biodiversity should be avoided, adequately mitigated or, as a last resort, appropriately compensated for.

#### *Assessment*

- 7.84 In accordance with NPPF paragraphs 170 and 175, London Plan Policy 7.19, draft London Plan Policy G6, and Local Plan Policy LP15, the Preliminary Ecological Appraisal (PEA) accompanying this planning application identifies a range of opportunities for the development to enhance the site's biodiversity (which, as a car park, is currently limited). These include the creation of green infrastructure within the development (such as brown/sedum roofs), placement of bug hotels within terrace gardens, sedum roofs and other newly created habitats, hedgehog highways and boxes, bird and bat boxes, sensitive lighting along the south and west rail corridors to avoid disturbance of commuting bats along the site boundaries, and planting native flora in retained or newly created habitats.
- 7.85 A bat survey was also carried out prior to the submission of the application and is included in the PEA. The bat survey finds that the buildings and trees within the site have negligible potential to support roosting bats. Nevertheless, the survey recommends including bat boxes within the scheme and sensitive lighting along the site boundaries to avoid disturbance to commuting bats.
- 7.86 The PEA also recommends that if demolition or vegetation clearance is scheduled between March-August, a pre-works check by an Ecological Clerk of Works (ECoW) is undertaken. An ECoW should also undertake a pre-works check to determine if any hedgehogs are active on the site. In both cases, this can be secured by a planning condition.
- 7.87 The PEA notes that the site contains one species of invasive non-native plant (Cotoneaster) and that this may require an invasive species specialist in order to ensure it is properly removed from the site. We anticipate that this will be controlled by a planning condition.
- 7.88 For the reasons set out above, the proposed development is consistent with policy objectives to enhance the natural and local environment and incorporate opportunities for biodiversity in new developments. The proposal is a sustainable development that should be approved without delay.

#### **Arboricultural Impact**

- 7.89 One of the ways the NPPF seeks to enhance the natural environment is by recognising the economic and other benefits of trees (Paragraph 170).
- 7.90 London Plan Policy 7.21 requires that existing trees of value are retained and that any loss is replaced following the principle of 'right place, right tree'. The policy encourages new developments to include additional trees. Draft London Plan Policy G7 requires that, wherever possible, existing trees of quality are retained and that if trees are removed, adequate replacement will be provided based on the existing value of the benefits of the trees removed,
- 7.91 Local Plan Policy LP16 requires the protection of existing trees and the provision of new trees to deliver amenity and biodiversity benefits. The Council will resist the loss of trees unless the tree is dead, dying or dangerous, causes significant damage to adjacent structures or has little or no amenity value. For any tree

that is felled, an appropriate replacement will be required (or a financial contribution to the provision of a tree off-site).

#### *Assessment*

7.92 Within the application boundary there are 64 existing trees. Of these trees, 10 are category B (moderate quality and value), 50 are category C (low quality and value) and 4 are category U (unsuitable for retention). 42 trees are protected by a Tree Preservation Order.

7.93 Of the 64 existing trees on site, 40 will be lost as a result of the proposed development (38 of which are subject to a Tree Preservation Order). In order to mitigate the loss of the 40 trees, and in accordance with the principle of 'right place, right tree' required by London Plan Policy 7.21, the landscape scheme accompanying the planning application proposes 113 new trees throughout the public realm, including significant planting in the buffer between existing development and the proposal. The proposed development will not result in the loss of any Grade A trees and represents an opportunity to significantly improve the amenity value and quality of trees on the site, in accordance with the requirements of draft London Plan Policy G7.

### **Air Quality**

#### *Policy Summary*

7.94 Paragraph 181 of the NPPF seeks to sustain and contribute towards compliance with relevant limit values or national objectives for pollutants and states that opportunities to improve air quality or mitigate impacts should be identified.

7.95 London Plan Policy 7.14 requires that development proposals minimise increased exposure to poor air quality and are at least 'air quality neutral'. London Plan Policy 5.3 requires that proposals meet the minimum standards in the Mayor's supplementary planning guidance, which includes minimising air pollution. The draft London Plan (Policy SI1) requires that development does not lead to further deterioration of existing poor air quality or create new areas that exceed air quality limits.

7.96 Local Policy LP10 promotes good air quality design and new technologies. Developers should ensure at least 'emissions neutral' development.

#### *Assessment*

7.97 The site is located in an Air Quality Management Area (AQMA) due to exceedences of the annual mean NO<sub>2</sub> objective and the PM<sub>10</sub> objective.

7.98 The Air Quality Assessment (AQA) accompanying this planning application separates the impact of the proposed development into two phases: construction and operation. It concludes that with the implementation of a series of dust mitigation measures during construction, the residual significance of potential air quality impacts is not significant.

- 7.99 For the operational phase, the AQA reports that there will be no exceedances of the relevant air quality objectives on site and that, as a result, no mitigation measures are required. Furthermore, the air quality neutral benchmark has been met.
- 7.100 The Proposed Development is consistent with policy objectives to prevent unacceptable levels of air pollution. Indeed, the change of use that this application proposes will result in a reduction of traffic movements (resulting in a reduction of NO<sub>2</sub>) and the significant increase in the amount of trees on the site (including along Manor Road) will help to alleviate local air quality issues.

## Noise

### *Policy Summary*

- 7.101 Paragraph 180 requires new development to 'mitigate and reduce to a minimum' potential adverse impacts resulting from noise – and avoid noise giving rise to significant adverse impacts on health and the quality of life. The NPPF also seeks to create places with a high standard of amenity for existing and future users (Paragraph 127).
- 7.102 London Plan Policy 5.3 requires that proposals meet the minimum standards in the Mayor's supplementary planning guidance, which includes minimising noise pollution. Policy 7.15 requires that proposals manage noise by mitigating and minimising the potential adverse impacts of noise from new development.
- 7.103 Draft London Plan Policy D13 requires that noise is managed by 'mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on development'. It also seeks to ensure that new noise-sensitive development is separated from major noise sources through the use of distance, screening, internal layout design or sound insulation. However, the policy also notes that where it is not possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through 'applying good acoustic design principles'.
- 7.104 Local Plan Policy LP10 encourages good acoustic design to ensure occupiers of new and existing noise sensitive buildings are protected. The policy requires mitigation measures where noise needs to be controlled and managed.

### *Assessment*

- 7.105 The Noise Impact Assessment accompanying the application establishes the existing conditions and assesses the impact of noise and vibration on the proposed development. It confirms that the impact of vibration would not be significant and therefore no mitigation is required and that plant emission limits can be readily achieved with appropriate mitigation measures.
- 7.106 The scheme will provide an acceptable standard of residential accommodation – engineering solutions for glazing and ventilation will mean that appropriate internal noise levels can be achieved despite the noisy edge conditions associated with the railway. This will allow a high quality of residential development to be achieved.

- 7.107 Whilst some of the amenity areas will experience noise greater than 55dB (the noise level targeted by the World Health Organisation to avoid annoyance), BS 8233 advises that in higher noise areas (such as urban areas adjoining strategic transport networks), a compromise between elevated noise and other factors, such as the convenience of living in these locations, might be warranted. Nevertheless, the scheme has been designed to reduce the level of noise experienced in the amenity areas wherever possible: the private amenity provision along the site's western boundary is in the form of 'winter gardens' and the balconies for the units along the site's southern boundary are oriented away from the railway – they face the courtyard area within the site. In addition, acoustic absorption will be fitted to balconies in order to achieve the lowest practicable noise level and screening will be provided along the site's boundaries as part of the landscape design. In accordance with draft London Plan Policy D13, the potential adverse effects will be controlled and mitigated through the application of good acoustic design principles.
- 7.108 The proposed development is consistent with planning policy, which seeks to 'mitigate and reduce to a minimum' potential adverse impacts resulting from noise.

### **Wind Microclimate**

#### *Policy Summary*

- 7.109 London Plan Policy 7.6 requires that buildings do not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to wind and microclimate. Draft London Plan Policy D8 also requires that the impact of tall buildings on wind and microclimate is fully considered and does not compromise comfort and the enjoyment of open spaces around the building.
- 7.110 Local Plan Policy LP2 requires proposals to take into account climatic effects, including diversion of wind speeds.

#### *Assessment*

- 7.111 The planning application is accompanied by a Wind Microclimate Assessment. The Assessment confirms that, in accordance with London Plan Policy 7.6, draft London Plan Policy D8, and Local Plan Policy LP2, the proposed development will not cause unacceptable harm in relation to wind and microclimate. With the recommended mitigation measures in place (which include the positioning of landscaping features), wind conditions across the entire site are expected to be acceptable for the intended activities.

### **Daylight/Sunlight**

#### *Policy Summary*

- 7.112 NPPF Paragraph 127 seeks to create places with a high standard of amenity for existing and future users.
- 7.113 London Plan Policy 7.6 states that buildings should not cause unacceptable harm to the amenity of surrounding land and buildings in relation to overshadowing. Draft London Plan Policy D8 also requires that the impact of tall buildings on daylight/sunlight is fully considered and does not compromise comfort and the enjoyment of open spaces around the building.

7.114 At the local level, Local Plan Policy LP8 seeks to ensure the design and layout of buildings enables good standards of daylight and sunlight to be achieved in new development and existing properties affected by the development.

*Assessment*

7.115 The Daylight/Sunlight Assessment accompanying this planning application assesses the impact of the proposed development on neighbouring residential units and amenity spaces as well as the daylight potential within the proposed dwellings.

7.116 The Assessment concludes that overall the proposed development relates well to neighbouring residential properties – the results of the VSC test show that 84% of the assessed windows meet the BRE Guidelines and the results of the NSL test show that 93% of the assessed windows meet the BRE Guidelines.

7.117 Where daylight/sunlight levels fall short of the BRE Guidelines, this is largely due to the proximity and outlook of sensitive windows that overlook a site that is currently largely undeveloped. The following residential properties experience varying degrees of digression from the BRE Guidelines and are considered in further detail in the Daylight/Sunlight Assessment:

- 1-11 Manor Grove (although there are windows that do not meet the strict application of the BRE Guidelines in both the VSC and NSL forms of assessment, all windows will have a retained VSC value exceeding 22%, which is considered exceptionally good for an urban setting);
- 1-8 Victoria Villas (some windows will experience changes in light exceeding 20% but, in all cases, more than 60% of the area within the rooms they serve will continue to have a direct view of the sky at the working plane);
- 19-22 Victoria Villas (of the 9 windows that do not meet the BRE Guidelines for VSC, 6 are within 10% of the permissible 20% reduction and the remaining 3 serve bedrooms and a kitchen which, the BRE Guidelines recognise, carry less significance than living rooms. Whilst 3 rooms exceed the BRE recommendation in terms of NSL, they all retain an unobstructed view of the sky to more than 70% of the room area at working plane height) ; and
- 2-6 Bardolph Road (whilst there will be alterations in light beyond the recommended 20% of former VSC value, the retained levels of daylight are considered good for an urban location. Of the 5 rooms that fail the NSL assessment, 4 are bedrooms. It should be noted that these properties currently enjoy uncharacteristically high levels of daylight due to the relatively low-level existing structures currently on the site).

7.118 The proposed buildings themselves have also been tested for daylight potential. The Daylight Sunlight Assessment reports that 93% of the rooms tested will either meet or exceed the strict application of the BRE Guidelines and explains that where rooms do not meet the Guidelines, this is due to the provision of balconies and 'winter gardens' for private amenity space. The Daylight Sunlight Assessment concludes that the daylight amenity to the tested rooms is considered 'excellent'.

7.119 With reference to the impact of the proposed development on amenity spaces, the scheme performs well in overshadowing terms. Only one of the proposed amenity spaces fails to receive at least 2 hours of direct sunlight to over 50% of its area on 21<sup>st</sup> March. As a result of this, a further study was carried out to establish the



impact of the development on this amenity space in the summer months. The additional study on 21<sup>st</sup> June 2018 demonstrates that the sunlight potential will be significantly improved during the summer months, which is when the space is most likely to be used and enjoyed. The Daylight/Sunlight Assessment concludes that the development falls within the practical application and intention of the BRE Guidelines.

## Energy and Sustainability

### *Policy Summary*

- 7.120 NPPF Paragraph 148 encourages the planning system to support the transition to a low carbon future and supports renewable and low carbon energy. Paragraph 153 expects new development to comply with development plan policies on local requirements for decentralised energy and to take account of layout, building orientation, massing and landscaping to minimise energy consumption.
- 7.121 London Plan Policy 5.2 sets out the minimum scope for an Energy Assessment and requires that proposals 'make the fullest contribution' to minimising carbon dioxide in accordance with the energy hierarchy: be lean, be clean, be green. For carbon dioxide emissions in non-domestic buildings, it requires a 35% improvement on 2013 building regulations. In addition, Policy 5.3 requires that proposals meet the minimum standards in the Mayor's supplementary planning guidance, which includes minimising carbon dioxide emissions.
- 7.122 For major proposals, London Plan Policy 5.6 sets the following hierarchy for selecting energy systems: connection to existing heating or cooling networks, site wide CHP network, communal heating and cooling. Policy 5.7 encourages a reduction in expected carbon dioxide emissions through the use of on-site renewable energy generation.
- 7.123 Draft London Plan Policy SI2 requires new development to be zero carbon (targeting a minimum on-site reduction of at least 35% beyond building regulations) and minimise both annual and peak energy demand in accordance with the be lean, be clean, be green energy hierarchy. Where the zero-carbon target cannot be met on-site the shortfall should be provided through a cash in lieu contribution to the carbon offset fund,
- 7.124 At the local level, Local Plan Policy LP20 requires new development to minimise the effects of overheating as well as minimise energy consumption in accordance with a defined cooling hierarchy. Local Plan Policy LP22 requires new non-residential buildings to achieve BREEAM 'Excellent' and new residential buildings to achieve zero carbon standards in line with the London Plan. Are we compliant with the draft London Plan?

### *Assessment*

- 7.125 In accordance with London Plan Policy 5.2 and 5.7, which require reductions in carbon dioxide emissions through the use of on-site renewable energy generation so that new residential developments are zero carbon, the residential part of the scheme achieves a 45% improvement over 2013 Building Regulations targets through the 'be Lean, be clean, be green' energy hierarchy and proposes a carbon offset payment of £451,800 to meet the 55% shortfall. In accordance with London Plan Policy 5.2, which requires non-residential areas to achieve the BREEAM 'Excellent' standard, the non-residential part of the proposal targets a BREEAM 'Excellent' rating.

- 7.126 With reference to zero carbon technologies, the proposed development incorporates a 105sqm PV panel area and air source heat pumps. These technologies are considered to be the most appropriate for the scheme and are highly compatible. The Energy Strategy accompanying the application explains what other technologies were considered and why these were discounted.
- 7.127 The proposed development is also capable of meeting the overall carbon reduction targets set out in the draft London Plan. With an increase to the carbon offset payment proposed for the non-residential element of the scheme, the development would be able to comply with the requirements of draft London Plan Policy SI2 (the residential element of the scheme is already zero carbon, in line with current policy targets, and no changes would be necessary to meet the requirements of draft Policy SI2).

## **Contamination**

### *Policy Summary*

- 7.128 NPPF Paragraph 178 requires that ground conditions, and any risks arising from contamination, are taken into account in order to ensure that the site is suitable for its proposed use.
- 7.129 The London Plan (Policy 5.21) requires that appropriate measures are taken to ensure that development on previously contaminated land does not activate or spread contamination.
- 7.130 Local Plan Policy LP10 states that the Council promotes the remediation of contaminated land where development comes forward. Potential contamination risks will need to be properly considered and adequately mitigated before development proceeds.

### *Assessment*

- 7.131 In accordance with Local Plan Policy LP10, which requires that potential contamination risks are properly considered, the planning application is accompanied by a Geo-Environmental and Geotechnical Preliminary Risk Assessment.
- 7.132 A detailed Unexploded Ordnance (UXO) Threat and Risk Assessment is included as an appendix to the Geo-Environmental and Geotechnical Preliminary Risk Assessment. Due to the level of risk identified across the site, the Assessment recommends that a specialist is consulted prior to any below ground works.

## 8. Planning Obligations and Community Infrastructure

### Levy

8.1 In respect of the negotiation of planning obligations associated with development, Regulation 122 (2) of the Community Infrastructure Levy (CIL) Regulations states that:

*“A planning obligation may only constitute a reason for granting planning permission for the development if the obligation is –*

- a) Necessary to make the development acceptable in planning terms;*
- b) Directly related to the development; and*
- c) Fairly and reasonably related in scale and kind to the development.”*

### Draft Section 106 Agreement Heads of Terms

8.2 Planning obligations will be secured to mitigate impacts arising from the scheme, potentially including provisions associated with the following Draft Heads of Terms:

- Affordable Housing (including amount, tenure split, nomination rights for affordable rent, Registered Provider selection, phasing and Affordable Housing Scheme)
- Off-site highways works to Manor Road (to be completed under S278 of the Highways Act 1980);
- Controlled Parking Zone extension;
- Electric Vehicle charging points;
- Car club parking provision;
- Travel Plan;
- Carbon Offset Contribution;
- Employment and Skills; and
- S106 Monitoring Costs.

8.3 The above Heads of Terms obligations have been considered against and are in accordance with the LBRUT Planning Obligations Supplementary Planning Document (SPD) (July 2014).

8.4 It is anticipated that a final package of Section 106 contributions will continue to be discussed with officers following submission of the Planning Application and receipt of consultation responses from Transport for London and others.

### Community Infrastructure Levy

- 8.5 The LBRUT CIL Charging Schedule came into effect from 1 November 2014. The site falls within the Higher Band CIL Charging Zone where the rates relevant to the Proposed Development are as follows:
- Residential - £250 per sqm;
  - Retail / commercial floorspace not wholly/mainly convenience, nor inside Richmond Town Centre – £0 per sqm.
- 8.6 We note that the CIL Regulation 123 List for LBRUT confirms projects which the Council intends to fund in whole or in part from CIL revenue, includes ‘improvements upgrades and refurbishments of North Sheen rail station’.
- 8.7 The development is also liable for Mayoral CIL (MCIL) which came into effect on 1 April 2012. MCIL rates are scheduled to be revised in April 2019, and the MCIL2 rates associated with LBRUT are £80 per sqm (Band 1).
- 8.8 It should be noted that the existing Homebase store has been in lawful retail use for at least six months of the last three years.
- 8.9 Affordable housing provided within the scheme will qualify for social housing relief from CIL.

## 9. Summary and Conclusions

- 9.1 This Planning Statement has been prepared by Avison Young in support of a full planning application for comprehensive residential-led redevelopment of four buildings of between four and nine storeys to provide 385 residential units (Class C3), flexible retail /community / office uses (Classes A1, A2, A3, D2, B1), provision of car and cycle parking, landscaping, public and private open spaces and all other necessary enabling works.
- 9.2 The proposed development will deliver a number of significant benefits to LBRUT residents, including the delivery of new homes, reduced number of car trips arising from a car free development, improvements to air quality associated with a reduction in road traffic emissions, economic benefits, a contribution to community infrastructure under CIL, new high quality public realm and an improved relationship between Manor Road and the site.
- 9.3 This Planning Statement assesses the proposed development against the applicable national, strategic and local planning policies and guidance and summarises the key planning considerations that arise within this context.
- 9.4 In accordance with planning policy at all levels, which supports the provision of residential development and the optimisation of the potential for housing delivery on all suitable and available brownfield sites, the proposed development represents sustainable development on land that is 'previously developed' in an accessible urban location where there is an opportunity to make more effective use of the land. The proposed development is therefore acceptable in principle.
- 9.5 With reference to heritage, the proposed development sustains the significance of all the designated and non-designated assets in the study area. Overall, the proposed development does not lead to any harm to the significance of surrounding heritage assets.
- 9.6 With reference to the impact on 'townscape' and 'visual' receptors, the TVIA concludes that the proposal enhances the townscape character and visual appearance of this area of Richmond, providing high quality architecture that improves legibility within the wider townscape. The townscape impact is acceptable.
- 9.7 The potential impacts of the proposed development from a transport perspective have been thoroughly assessed. The Transport Assessment demonstrates that the proposed development is acceptable in transport terms, that suitable access can be achieved, and that there will be no significant transport impacts as a result of the proposed development as the scheme will result in a reduction of traffic compared to the existing use.
- 9.8 With reference to environmental considerations:
- The proposed development is located in Flood Zone 1. Sustainable Urban Drainage Systems (SuDS) have been incorporated into the scheme and, in accordance with planning policy at all levels, the proposed development does not increase the flood risk elsewhere;
  - The proposed development is consistent with policy objectives to prevent unacceptable levels of air pollution;

- The site's biodiversity will be improved and a range of measures are proposed to ensure existing ecology on the site is appropriately protected;
- The proposed development will not result in the loss of any Grade A trees. Although 38 of the 40 trees that will be lost are covered by a TPO, only 6 are of 'moderate quality and value' (Category B) – 29 are of 'low quality and value' (Category C) and 3 are unsuitable for retention (Category U). The two non-TPO trees to be removed are also Category U. The loss is offset by the planting of 113 new trees throughout the public realm;
- The proposed development is consistent with planning policy, which seeks to 'mitigate and reduce to a minimum' potential adverse impacts resulting from noise;
- With reference to daylight/sunlight, the proposed development relates well to neighbouring residential properties – the results of the VSC test show that 84% of the assessed windows meet the BRE Guidelines and the results of the NSL test show that 93% of the assessed windows meet the BRE Guidelines. Where daylight/sunlight levels fall short of the BRE Guidelines, this is largely due to the proximity and outlook of sensitive windows that overlook a site that is currently largely undeveloped. The results of the internal assessment for the proposed development are good;
- The residential part of the scheme achieves a 45% improvement over 2013 Building Regulations targets and proposes a carbon offset payment to meet the shortfall. The non-residential part of the proposal targets a BREEAM 'Excellent' rating; and
- The proposed development will not cause unacceptable harm in relation to wind and microclimate. Wind conditions across the entire site are expected to be acceptable for the intended activities.

9.9 This Statement demonstrates that the proposed development complies with the overall objectives of national, regional and local policy and guidance. In doing so, the scheme delivers the sustainable redevelopment of the site that will contribute significantly to the supply of housing (and affordable housing) in LRBUT. Therefore, it is considered that the overall planning merits of the proposal should be supported.

# Contact Details

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## Enquiries

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[rachel.crick@avisonyoung.com](mailto:rachel.crick@avisonyoung.com)

## Visit us online

[avisonyoung.co.uk](http://avisonyoung.co.uk)

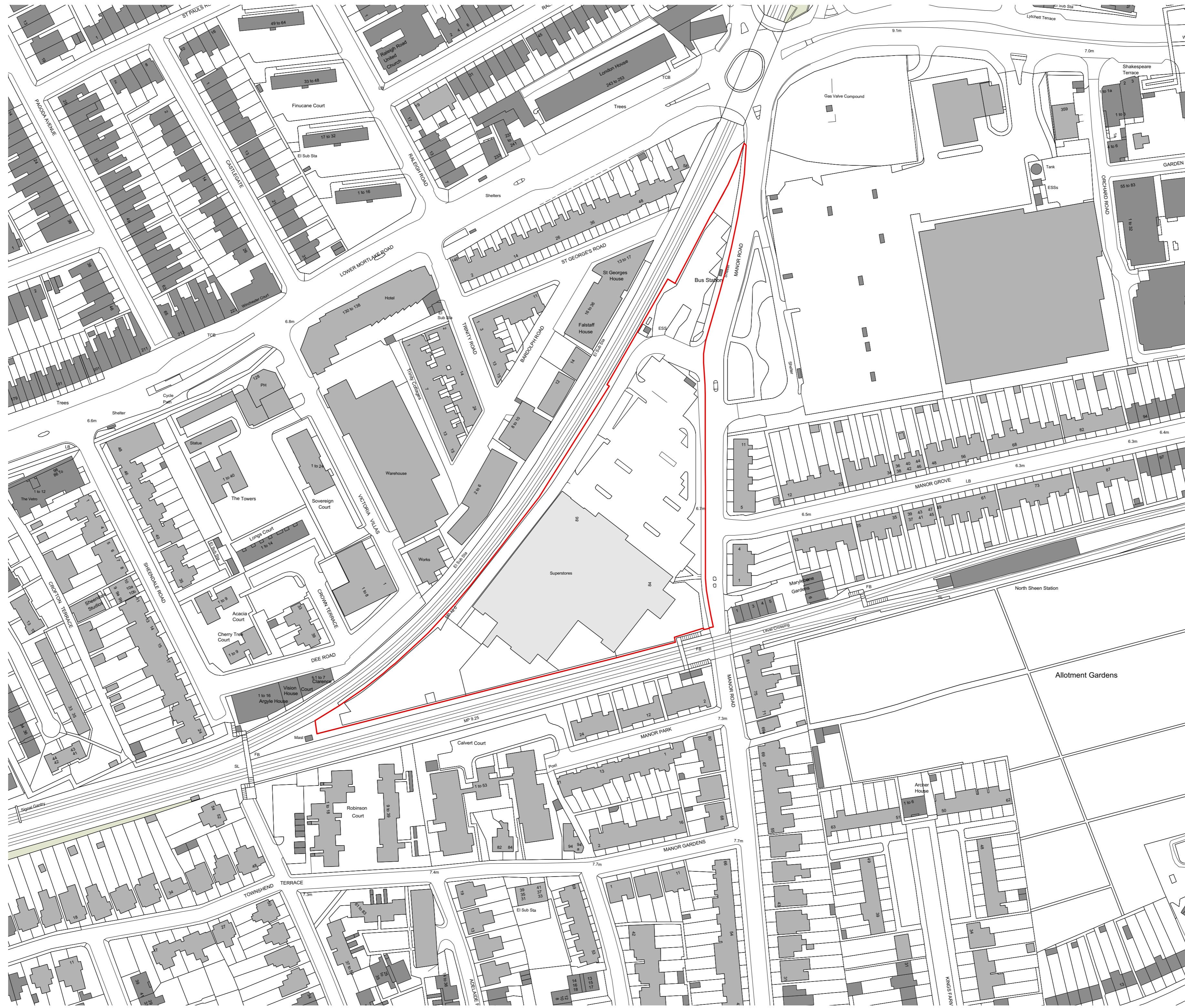
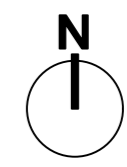
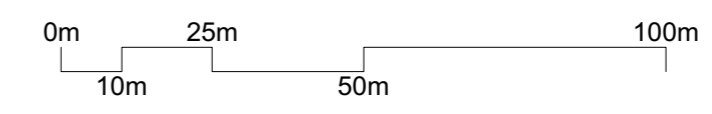
## Appendix A – Planning History

Reference	Description	Status
06/0967/FUL	Vary condition (F) of planning permission 91/0270/OUT so as to allow sub division of the DIY store.	Withdrawn
04/2402/PS192	Installation of internal mezzanine floor.	Approved 13/9/04
00/2353	Improvements to Bus Terminal Including Details Of Site.	No further action taken 22/1/04
99/1141	Proposed Garden Centre Extension, Enclosure Of Existing Service Yard Canopy, Installation Of Additional Garden Centre Doors, Blocking Up Of Existing Display Window, Internal Alterations To Form Mezzanine Storage Area.	Approved 14/9/99
94/1763/FUL	Variation of condition (G) attached to planning permission ref: 91/0270/OUT dated 10 September 1991 extension of garden centre to provide an additional 336.59sqm floor space erection of new access gates and timber fencing and insertion of new automatic sliding doors in existing non-food retail superstore. Retention of glazed panel and brick enclosure.	Approved 16/9/94
91/2243/FUL	Change Of Use Of Site From Open Air Car Sales To Car Parking And Part Bus Lay-by Facility In Association With The Homebase Store Currently Being Constructed.	Approved 19/5/92
91/0270/OUT	Erection Of Two Non-food Retail Warehouse Units Within Use Class A1, One With Garden Centre, New Vehicle And Pedestrian Access And Car Parking And Associated Landscaping.	Approved 22/8/91
90/1169/OUT	Erection of Two Non Food Retail Warehouse Units Within Use Class A1 Of the T&CP (use Classes) Order 1987, One With Garden Centre New Vehicle & Pedestrian Access, Car Parking, Landscaping.	No further action taken 2/5/91
90/1170/OUT	Erection of Two Non Food Retail Warehouse Unit, One With Garden Centre, New Vehicle & Pedestrian Access & Car Parking & Associated Landscaping. (duplicate application).	Unknown 20/8/90



# Appendix B – Site Location Plan





General notes

All setting out must be checked on site  
 All levels must be checked on site and refer to  
 Ordnance Datum Newlyn unless alternative Datum given  
 All fixings and weatherings must be checked on site  
 All dimensions must be checked on site  
 This drawing must not be scaled  
 This drawing must be read in conjunction with all other  
 relevant drawings, specification clauses and current design risk  
 register  
 This drawing must not be used for land transfer purposes  
 Calculated areas in accordance with Assael Architecture's  
 Definition of Areas for Schedule of Areas  
 This drawing must not be used on site unless issued for  
 construction  
 Subject to survey, consultation and approval from all statutory  
 Authorities

Revision Status:  
 P-Preliminary  
 C-Contract

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Electronic file reference

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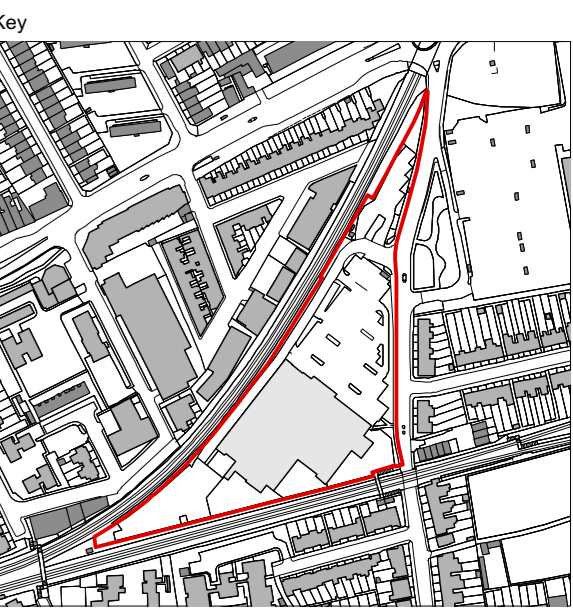
Status R:	Revision	Date	DRN	CHK	CDM
1	Planning Draft	15/01/19	HB	JL	
2	For Planning	06/02/19	RD	HB	

Purpose of information

The purpose of the information on this drawing is for:

Planning	<input checked="" type="checkbox"/>
Information	<input type="checkbox"/>
Comment	<input type="checkbox"/>
Client approval	<input type="checkbox"/>
Construction	<input type="checkbox"/>

All information on this drawing is not for construction unless it is marked for construction.



Client

**Avanton**

Project title

**A3004  
 Manor Road Richmond**

Drawing title

**Location Plan Existing**

Scale @ A1 size

**1:1250**

Date

**Feb '19**

Drawing N°

**MNR-AA-ALL-ZZ-DR-A-1000**

Status & Revision

**R2**





# Appendix C – GLA Pre-App Response Letter

# GREATER LONDON AUTHORITY

**Rachel Crick**  
GVA  
65 Gresham Street  
London  
EC2V 7NQ

**Department: Planning**  
Your reference:  
Our reference: GLA/4795/LB  
Date: 21 January 2019

Dear Ms Crick

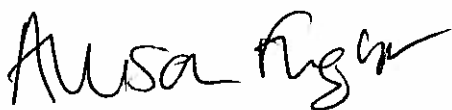
**Town & Country Planning Act 1990 (as amended); Greater London Authority Act 1999 & 2007; Town & Country Planning (Mayor of London) Order 2008**

**Site: Homebase, Manor Road**  
**LPA: London Borough of Richmond-upon-Thames**  
**Our reference: GLA/4894**

Further to the pre-planning application meeting held on 20 December, I enclose a copy of the GLA's assessment which sets out our advice and matters which will need to be fully addressed before the application is submitted to the local planning authority.

The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

Yours sincerely



*RF*  
**John Finlayson**  
Head of Development Management

cc London Assembly Constituency Member  
Nicky Gavron, Chair of London Assembly Planning Committee  
National Planning Casework Unit, DCLG  
Lucinda Taylor, TfL

## Homebase Site, Manor Road

In the London Borough of Richmond-upon-Thames

### The proposal

Redevelopment of the site to provide a residential led scheme comprising 385 units, commercial floorspace and new public realm.

### The applicant

The applicant is **Avanton** and the architect is **Assael**.

### Context

1 On 20 December 2018 a pre-planning application meeting to discuss the above proposal for the above site was held at City Hall, with the following attendees:

#### GLA Group

Luke Butler	Senior Strategic Planner - Case Officer
James Keogh	Principal Strategic Planner - Urban Design

#### Applicant

Tom Bennett	ICG Longbow
Marc Pennick	Avanton
Chris Cobham	Avanton
Tim Chapman-Cavanagh	Assael Architects
Holly Barker	Assael Architects
Nick Alston	GVA Planning
Rebecca Doull	GVA Planning

2 The advice given by GLA officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of an application.

### Site description

3 The site is located in North Sheen on Manor Road in the London Borough of Richmond on Thames. The site is 1.5 hectares in size and bounded by railway lines to the north and south. The east of the site is bounded by Manor Road. North Sheen Bus Terminus is located to the north.

4 Currently the site comprises of a large, low density retail unit with a large amount of surface level car parking. To the east of the site is an additional low density retail unit which is currently occupied by a Sainsbury's store.

5 The are no listed buildings within the vicinity of the site. The Sheendale Road Conservation Area and Sheen Road Richmond Conservation Area are to the west and south west respectively.

6 The site sits within Richmond's character area 6 'Old Gas Works', as defined in the Richmond and Richmond Hill Village Planning Guidance SPD (June 2016).

7 The site is located immediately south of the A316 Manor Circus which forms part of the Transport for London Road Network (TLRN). A level crossing is located on Manor Road immediately south of the site boundary.

8 The entrance to North Sheen rail station is located on the opposite side of Manor Road near the site's southern boundary, there are also 10 bus routes within an acceptable walk distance with stops on Manor Road and Lower Mortlake Road. Based on TfL's Webcat toolkit the application site has a public transport accessibility level (PTAL) of 5, on a scale of 1 to 6b where 6b is the most accessible.

## **Details of the proposal**

9 The scheme proposes redevelopment of the site to provide a residential led scheme of 385 residential units including 35% affordable housing and 480 sq.m. (GIA) of flexible commercial floorspace at ground floor facing a new public square with a retail kiosk. The proposed buildings range from ground plus one to ground plus eight storeys in height and include associated cycle parking, car parking, playspace, landscaping and public realm improvements.

10 The applicant also has an interest in land directly to the north of the application site, the North Sheen bus depot, which does not form part of the scheme proposals at this time.

11 The proposal would be referable to the Mayor under Categories 1A and 1B of the Schedule of the 2008 Order:

- 1A '*Development which comprises or includes the provision of more than 150 houses, flats or houses and flats*';
- 1B (c) '*Development (other than development which only comprises the provision of houses, flats or houses and flats) which comprises or includes the erection of a building or buildings outside Central London and with a total floorspace of more than 15,000 square metres*'

## **Strategic planning issues and relevant policies and guidance**

12 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Richmond Local Plan 2018; and, the London Plan 2016 (Consolidated with Alterations since 2011).

13 The following are relevant material considerations:

- Revised National Planning Policy Framework (July 2018);
- National Planning Policy Guidance;
- Draft London Plan (consultation draft December 2017, incorporating early suggested changes published August 2018) which should be taken into account as explained in the NPPF; and
- Richmond and Richmond Hill Village Planning Guidance (June 2016).

14 The relevant strategic issues and corresponding policies are as follows:

- Housing *London Plan; Affordable Housing and Viability SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG.*
- Retail *London Plan.*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG.*
- Inclusive design *London Plan; Accessible London: achieving an inclusive environment SPG.*
- Climate change *London Plan; Sustainable Design and Construction SPG; London Environment Strategy.*
- Transport *London Plan; the Mayor's Transport Strategy; Land for Industry and Transport SPG.*
- Water *London Plan; London Environment Strategy.*

## **Case history**

15 A pre-application meeting was held on 10 October 2018 to discuss a proposal for the redevelopment of this site and a written pre-application note was issued on 8 November 2018. GLA officers supported the redevelopment of the site to provide 381 residential units across two buildings, including 522 sq. m. of commercial space. The GLA highlighted that there was scope for additional height in the centre of the site. Some matters relating to affordable housing; urban design; inclusive access; climate change; flood risk, drainage and water; and transport required resolution in order to make the proposals compliant with the London Plan and draft London Plan.

## **Summary of meeting discussion**

16 Following a presentation of the proposed scheme from the applicant team, the meeting discussions covered strategic issues with respect of affordable housing and urban design. GLA officer advice in respect of these issues is set out within the sections that follow. This note should be read in conjunction with the previous pre-application advice issued 8 November 2018.

## **Principle of development**

17 The principle of development has previously been agreed, and the redevelopment of the low-density retail unit and associated surface level car parking for a residential led scheme was supported.

18 There was no objection to the loss of the retail use, which is not located in a designated town centre.

19 The proposals include 480 sq.m. of commercial floorspace. Given the existing context, the provision of small-scale supporting commercial uses to contribute to a sense of place is supported.

## Affordable housing

20 London Plan Policies 3.11 and 3.12 and draft London Plan Policy H5 and Policy H6 seek to maximise the delivery of affordable housing, setting a strategic target of 50% across London. and Policy H7 provides a flexibly prescribed tenure mix of: 30% social rent / London Affordable Rent; 30% intermediate products; and, 40% to be determined by the relevant local authority based on identified need and consistency with the definition of affordable housing.

21 The draft London Plan and the Mayor's Affordable Housing and Viability Supplementary Planning Guidance seek to increase the provision of affordable housing in London and embed affordable housing into land prices. The SPG introduced a threshold approach to viability, which is incorporated within draft London Plan Policy H6; schemes that provide 35% affordable housing by habitable room without public subsidy and that meet other criteria, including tenure, are not required to submit viability information to the GLA. Such applications are also exempted from a late stage review mechanism; this is known as the Fast Track route.

22 The applicant confirmed at the meeting the intended affordable housing offer is 35% by habitable room, comprising 132 of the 385 units. The tenure split proposed is 50% affordable rent and 50% shared ownership by habitable room, comprising 53 affordable rent units and 79 shared ownership units. The applicant must provide full details of the tenure mix, details of any rent levels and any income thresholds.

23 If a 35% affordable housing by habitable room offering is made at application stage in accordance with the Mayor's Affordable Housing and Viability SPG and the draft London Plan the scheme would qualify for the Fast Track Route.

24 The applicant is reminded that they should investigate Mayoral grant funding opportunities as part of this process in order to qualify for fast track, so that the affordable housing provision is maximised. If the application cannot be assessed under the Fast Track route, a financial viability assessment will be required.

25 In addition, the affordability of the units must accord with the requirements of Policy H7 of the draft London Plan, the Mayor's Affordable Housing and Viability SPG and the London Plan Annual Monitoring Report 14 for 2017/18. Details of the proposed products must therefore be submitted, and the applicant should note that London Affordable Rent, London Living Rent and London Shared Ownership are the Mayor's preferred affordable housing tenures.

26 In accordance with Policy H6 of the draft London Plan and the Mayor's SPG, the S106 agreement must include an early stage viability review mechanism to be triggered if an agreed level of progress on implementation has not been made within two years of any planning permission. Moreover, if the proposals cannot be assessed under the Fast Track Route, a late stage review will also be required and secured within the S106. A draft of the S106 agreement must be agreed with GLA officers during the course of the application; example clauses are provided within the SPG.

27 Richmond Council will be expected to publish any financial viability assessment, submitted to support a planning application, in accordance with the Mayor's Affordable Housing and Viability SPG. GLA officers will ensure that the assessment is made available, to ensure transparency of information.



## Housing mix

28 London Plan Policy 3.8 and draft London Plan Policy H12 encourage a full range of housing choice. Draft London Plan Policy H12 recognises that central or urban sites may be most appropriate for schemes with a significant number of one and two beds. Owing to the accessible location, the proposed housing mix, shown in table one below, does not raise any strategic planning concerns.

*Table one: proposed unit mix*

<b>No. bedrooms</b>	<b>Units</b>	<b>% of total</b>
1 bed	152	40%
2 bed	178	46%
3 bed	55	14%
Total	385	

## Residential quality

29 London Plan Policy 3.5 and Policy D4 of the draft London Plan promote quality in new housing provision, with further guidance provided in the Housing SPG. The scheme meets the minimum residential space standards and should continue to do so as it progresses to a full application.

## Children's play space

30 Policy 3.6 of the London Plan and Policy S4 of the draft London Plan, seeks to ensure that development proposals include suitable provision for play and recreation. The applicant has demonstrated compliance on site, which is welcomed.

## **Urban design**

31 The broad layout principles are supported. The pedestrian and cycle routes to and from the site should be clearly defined as part of the public realm strategy.

32 The applicant has demonstrated the uses that flank the proposed public square are appropriate when considered alongside the arrangement of the blocks. Further work has improved the openings to courtyard spaces to reduce any detracting from the distinction between public and private realm. The treatment of the green spaces between the two southern blocks and railway has been reconsidered and represents an improved response to avoid any 'left over' spaces or poorly overlooked areas that could encourage anti-social behaviour.

33 The inclusion of ground floor duplexes is welcomed and will help to activate the main street frontage. The applicant has located additional duplex units along the railway edge of the south eastern block to create a 'mews' type environment. This will encourage passive surveillance along this edge and reduces the number of single aspect units facing onto the railway. This is welcomed.

34 The north facing, single aspect units at the far north of the site, facing the bus depot, must be reconsidered. The residential quality, particularly in terms of outlook on the lower floors, is a concern.

35 At the upper levels, residential layouts are efficient with a good distribution of cores creating good core to unit ratios.

36 Internal layouts should be provided to ensure that all units will provide liveable environments with good access to natural daylight. ADF testing should be undertaken to ensure lower level inward facing units in particular receive adequate daylight penetration to living spaces. All units should also achieve 2.5 metre minimum floor to ceiling heights.

37 The heights and massing strategy responds positively to the existing low-rise context, with the scale dropping down to respect neighbouring properties along the south and eastern edges. The scope for additional height was identified in the previous pre-application advice and the applicant has now incorporated this in the design, with the tallest building being 9 storeys at the centre of the site. Given the accessibility of the site, the applicant should explore further height. In particular, there is strong potential to increase the height of the 'jewel' building. Options should be tested in local townscape views in tandem with daylight/sunlight analysis.

38 A taller building would be beneficial in terms of landmarking the proposed public square.

39 The simple and refined approach to the architecture is welcomed and the intention to explore the use of varying tones of brickwork to create character areas across the site remains supported

40 The applicant is encouraged to take the scheme to the Design Review Panel at the earliest opportunity.

## **Inclusive access**

41 London Plan Policy 3.8 and Policy D5 of the draft London Plan require that ninety percent of new housing meets Building Regulation requirement M4(2) 'accessible and adaptable dwellings' and ten per cent of new housing meets Building Regulation requirement M4(3) 'wheelchair user dwellings', that is, designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users. The location of wheelchair units should be indicated on the plans and provided across tenures and unit sizes.

42 Any application must provide full details of the accessibility and how any level changes are managed for both residential and retail accommodation.

## **Conclusion**

43 The proposed redevelopment of the site to provide a residential-led scheme comprising 381 units and 480 sq.m. commercial floorspace is supported in principle and the scale and massing is appropriate, with scope for additional height in the central areas of the site to create a landmark building.

44 In addition to the issues identified in this report, issues relating to climate change; flood risk, drainage and water; and transport detailed in the pre-application report issued on 8 November 2018 must also be addressed in order to make the proposals compliant with the London Plan and draft London Plan.

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