

Planning Statement

**Barnes Hospital, South Worple Way, London, SW14
8SU**

November 2021

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Appendix I OPP Committee Report

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Reviewed By: Simon Zargar

Status: Final

Date: November 2021

For and on behalf of Avison Young (UK) Limited

1. Introduction

- 1.1. This Planning Statement has been prepared by Avison Young on behalf of Star Land Realty UK Ltd ('the Applicant') in support of a full planning application encompassing the western part of the Barnes Hospital campus (Residential Plot) ('the site') for a residential development comprising 109 units (including affordable housing), landscaping, parking and associated works.
- 1.2. This Statement sets out the planning case in support of the planning application. It summarises the recent planning history of the site and assesses the proposed development in the context of relevant planning policies and guidance.
- 1.3. Full details of the proposals are set out in Section 5 of this Statement. Full planning permission ('the Proposed Development') is sought for:

"Demolition of existing structures and redevelopment of site including construction of three new buildings comprising residential units of mixed tenure (Use Class C3), conversion of two existing buildings for residential use (Use Class C3), car and cycle parking, landscaping and associated works."

- 1.4. The Proposed Development is being brought forward jointly by Star Land Realty UK Ltd (a 50:50 joint venture between Aurum Investments Ltd and Lee Kim Tah Holdings Ltd). Star Land Realty UK Ltd, with the assistance of LS Estates as Development Managers, purchased the Residential Plot of the Barnes Hospital site from the NHS Trust in March 2019.
- 1.5. Aurum Investments is a subsidiary of Woh Hup Holdings, a successful privately owned construction company operating from Singapore with a 2,500 workforce and turnover of over £1bn. Aurum looks to invest in start ups and human centric proptechs with a focus to empower change and facilitate growth for business, professionals, individuals and its investments. Lee Kim Tah is a property investment and development group with real estate investments across the globe including Singapore, UK, Germany, India, China, Indonesia and Australia.
- 1.6. Both company's owners have known and worked in partnership for many years and have several co investments in the UK including residential developments in Little Venice (45 units), Maida Vale (12 units), St John's Wood (165 units), Newmarket (21 units) and Basingstoke (120 units). They have further ambitions for residential development in the UK and wish to build a strong and reputable brand. The Barnes Hospital site offers the opportunity to provide quality housing that will satisfy their intentions focussed on meeting housing need locally to benefit of residents of the London Borough of Richmond Upon Thames.

- 1.7. LS Estates are a real estate company based in central London, who have been working with Woh Hup and Lee Kim Tah for over 4 years. The Directors have extensive experience of developing commercial and residential real estate in the UK, Ireland and Europe, delivering over 15 million sf of real estate while working at Hammerson, Hines, Development Securities and U+I PLC respectively. LS Estates share the objective of their client to make Barnes Hospital an exemplar project, with a focus on quality and an agenda for an environmentally responsible and sustainable development, which meets the needs of the local housing market.

Context

- 1.8. This Statement should be read in conjunction with the submitted plans and drawings, as well as the following documents which are submitted in support of the planning application:

Document	Prepared by
Application Form & CIL Form	Avison Young
Design & Access Statement (inc. photomontage)	Scott Brownrigg
Planning Application Drawings (Site Location Plan, Site Plan, Existing & Proposed Floorplans, Elevations & Sections, Site Plan Overlay)	Scott Brownrigg
Streetscape Drawings, DWG No. 18387-SBR-ZZ-XX-DR-A-85003	Scott Brownrigg
Planning Statement	Avison Young
Heritage & Townscape Statement	Montagu Evans
Health Impact Assessment	Montagu Evans
Foul Sewage & Utilities	RBG
Flood Risk Assessment	RBG
SUDS Statement/Proforma	RBG
Basement Impact Assessment Report	RBG
Construction Traffic Management Plan	Motion
Transport Assessment (inc. Parking Layouts & Turning Circles/ Tracking; Travel Plan Statements; Delivery & Servicing Plan)	Motion
Viability Report (inc. Affordable Housing Statement – Detailed Affordable Housing Schedule, Approaches made to Registered Providers, Responses from Registered Providers)	Savills
Archaeological Assessment	AOC
Community Engagement Report	JBP

Sustainable Construction Checklist	Verte
Energy Assessment (inc. National Water Standards Statement & Decentralised Energy Network Feasibility)	Flatt Consulting
Ecology Report	Aspect Ecology
Biodiversity Net Gain assessment	Aspect Ecology
Green Roof Details, DWG No. 18387-SBR-ZZ-XX-DT-A-27001	Scott Brownrigg
Landscape Design and Access Statement (inc. Public Open Space Assessment, Green Roof Maintenance, Play Space Strategy and External Lighting Strategy)	Exterior
Tree Survey & Arboricultural Impact Assessment/Method Statement	Crown
Acoustic Assessment	Paragon
Air Quality Assessment	RPS
Air Quality Neutral Assessment	RPS
Proposed Development Daylight & Sunlight Assessment	XCO2
Daylight & Sunlight Assessment	XCO2
Contaminated Land Assessment	RBG
Fire Statement	Sweco

- 1.9. The site is currently vacant having been disposed of by the Healthcare Trust as part of its Estate Modernisation Programme (EMP). On 14 September 2020, Outline Planning Permission ('OPP') was granted for the redevelopment of the whole Barnes Hospital campus (ref. 18/3642/OUT), which comprised three development plots: (1) the residential plot, (2) the Special Educational Needs (SEN) School and (3) the health centre.
- 1.10. Whilst all three parts are still being delivered, it is now proposed that these will be brought forward on an individual site basis rather than through one outline permission and subsequent reserved matters.
- 1.11. This planning application therefore relates only to the residential plot of the wider campus.

2. Site and Surrounding Area

- 2.1. The site comprises the western portion of the decommissioned Barnes Hospital campus, comprising circa 0.81ha and is located within the London Borough of Richmond upon Thames (LBRuT). The site is currently occupied by a number of red-brick buildings ranging in height from 1-3 storeys with associated hard standing and some minimal soft landscaping around the perimeter of the site.
- 2.2. The site is located approximately 650m to the east of Mortlake Train Station, 1km to the west of Barnes Train Station and 340m to the south of the River Thames. It is bound by Mortlake Cemetery to the west, residential dwellings fronting Grosvenor Road to the south, the remainder of the hospital site to the east and South Worple Way to the north. The site's primary vehicular access is off South Worple Way.
- 2.3. The site is located in an area with good public transport accessibility. While TFL's WebCAT mapping software identifies the site as an area of PTAL 2 this underestimates the accessibility of the site by not taking into account all pedestrian routes, most notably the new pedestrian footbridge across the railway line at White Hart Lane. It was agreed with LBRuT as part of the OPP determination therefore that the site will likely be attributed a higher PTAL rating in the future and a rating of 4 is considered acceptable. As set out in the accompanying Transport Assessment, this position has been continued and reconfirmed with officers through the pre-application process for this application.
- 2.4. The site is not located within a Conservation Area, nor does it contain any statutory listed buildings. The Queens Road (Mortlake) Conservation Area (CA 35) is immediately adjacent to the west of the site while the Cowley Road Conservation Area (CA 79) is located to the north of the site across South Worple Way and the railway line.
- 2.5. There are eight locally listed Buildings of Townscape Merit ('BTMs') within the whole Barnes Hospital campus, five of which are located within the site. Of the five BTMs within the site, three were agreed to be removed as part of the OPP with two of the BTMs in the north of the site being retained.
- 2.6. The cemetery to the west of the site is designated as Other Open Land of Townscape Importance, ('OOLTI') and an Other Site of Nature Importance ('OSNI').
- 2.7. The surrounding area is residential in character made up of predominantly two storey terraced housing.

3. Planning History

3.1. The site benefits from an extant outline planning permission (ref. 18/3642/OUT) for residential use. Medical and educational uses were also permitted as part of the outline permission on the other parts of the Barnes Hospital campus that fall outside of this planning application boundary and will be brought forward separately to the east of the site.

3.2. This outline planning permission ('OPP') (ref. 18/3642/OUT) was granted on 14 September 2020 for:

"Outline planning permission for the demolition and comprehensive redevelopment (phased development) of land at Barnes Hospital to provide a mixed use development comprising a health centre (Use Class D1), a Special Educational Needs (SEN) School (Use Class D1), up to 80 new build residential units (Use class C3), the conversion of two of the retained BTMs for use for up to 3no. residential units (Use Class C3), the conversion of one BTM for medical use (Use Class D1), car parking, landscaping and associated works. All matters reserved save for the full details submitted in relation to access points at the site boundaries."

3.3. The OPP granted approval for a three-part phased development of the site: (1) the residential part, (2) the SEN School and (3) the health centre. The OPP approves the development of up to 80 residential units with associated car and cycle parking within three blocks of two and three storeys.

3.4. As part of the approval of the OPP, the following planning matters were agreed and continue to be relevant for this planning application:

- Loss of the Existing Use – the loss of the existing and vacant C2 buildings is considered acceptable. Marketing evidence for a 'social infrastructure' occupier for the site resulted in no bids being made. The site was considered to be underutilised by the Trust and therefore to be disposed of and the care services re-provided elsewhere as part of their Estate Modernisation Programme (EMP).
- Demolition of Existing Buildings – the loss of the existing buildings on the site was approved, including BTMs with the exception of the two to be retained in the northern section of the site.
- Principle of Residential Use – The use of the site for the delivery of residential housing was approved, noting that the maximum viable levels of social infrastructure through the SEN school and health centre were and are being delivered as replacement provision of social infrastructure.

- Residential Building Layouts – the layouts of the buildings in three blocks across the site was approved. Details of the locations and sizes of these blocks were secured through the Parameter Plans.
- Affordable Housing – The provision of 22% affordable housing with a 78/18 social/intermediate tenure split was agreed through the viability assessment and the location of the affordable units within Block C was approved.
- Design – The detailed design was secured through the preparation of the design code which was to inform any future reserved matters applications.
- Access – vehicle access was secured and agreed from South Worpole Way in the north-western part of the site.
- Parking Strategy – car parking at a ratio of 55% of the total number of units, primarily located within the basement was agreed.
- Playspace and Amenity Space – playspace was approved to be provided on-site for the 0-11 age categories with a financial contribution in lieu made for the 12+ age group. 1,293sqm of publicly accessible open space was approved and it was considered a reasonable assumption that most units would not have access to private amenity, but that was acceptable given the high levels of communal amenity space.

3.5. A copy of the Officer's Report to Committee for the OPP is provided at **Appendix 1**.

3.6. Aside from the above OPP, the other relevant planning history is an application for a certificate of lawful use for existing development (CLEUD) in June 2018 (ref.18/1883/ES191) to establish the existing use of the site as C2 (Residential Institutions). This conclusion was reached on the basis that the site had been used for the provision of long-term residential care of those needing enhanced mental health care, with a particular focus on elderly residents. In August 2018 the Council issued a CLEUD to confirm that the site's lawful use is C2.

4. Consultation and Community Involvement

- 4.1. An extensive consultation process has been undertaken by the applicant, engaging with local residents, the Trust, LBRuT planning, design, affordable housing and S106 officers, local resident and amenity groups, ward councillors and the local MP, Sarah Olney.
- 4.2. Engagement has been ongoing for two years and has continued following the consultation that was undertaken as part of the OPP. A full breakdown of the consultation process is provided in the accompanying Community Engagement Report, prepared by JBP, which accompanies this submission, whilst the Design and Access Statement, prepared by Scott Brownrigg provides further detail of how this consultation exercise informed the evolution of the Proposed Development's design.

Pre-application Engagement

- 4.3. The applicant has undertaken a proactive and collaborative approach to engagement and entered into a Planning Performance Agreement (PPA) with the Council. As part of this process, a number of formal meetings and design workshops took place:
- **Pre-application Meeting 1, 5th November 2020** – introduced the proposals and the principle of a standalone application for the residential site. The initial scheme proposals included a single storey increase in height to Blocks A and B above the OPP parameters.
 - **Pre-application Meeting 2, 4th March 2021** – the second meeting included the Council's Conservation Officer alongside the Case Officer and outlined the design development since the first meeting, in particular proposed increase in the height of Block C in line with that proposed for Blocks A and B.
 - **Design Workshop 1, 30th April 2021** – a design workshop with the Case Officer, Conservation Officer and the Urban Design Officer whereby the proposals from the 2nd pre-app meeting were presented and discussed in detail.
 - **Design Workshop 2, 19th May 2021** – a follow-up design workshop whereby the updated design (incorporating reduced massing to Block A) was discussed, with an additional focus on the detailed design elements of the scheme including elevational treatments, brick types, roofscape, gable ends and dormer windows.
 - **Pre-application Meeting 3, 28th June 2021** – third meeting with Officers, including attendance from the Council's Affordable Housing and Planning Obligations/CIL teams, focussing on wider planning considerations including affordable housing, viability and accessibility.

Public Engagement

- 4.4. Full details of the public consultation and engagement strategy that has been carried out by the applicant are set out in the Statement of Community Involvement ('SCI') prepared by JBP.
- 4.5. Public engagement was divided into two stages: a 'listening' phase and a 'reporting back' phase. The 'Listening Phase' enabled the project team to introduce themselves to stakeholders and uncover further detail about local wants, needs and concerns to do with the proposal for new homes at Barnes Hospital. Feedback from this phase influenced the development of the proposals.
- 4.6. The second phase entailed the consultation on the more developed proposals and engagement with the wider community, to listen to their feedback and answer any questions they may have had. Feedback received at this stage informed the development of the final proposals submitted as part of this planning application.
- 4.7. The consultation engaged with a wide range of local stakeholders and other interested parties, with ongoing correspondence and the provision of additional information on request, 15 meetings with local community and political stakeholders and the creation of a dedicated consultation website with details of the proposal.
- 4.8. Details of the feedback received are set out in the SCI. A summary of the consultation outcomes and how the proposals were shaped by the process is set out below:
- Feedback relating to the basement has resulted in a reduction in the amount of excavation, leading to fewer construction vehicle trips.
 - It has also resulted in a reduction in the footprint of the basement along the Southern boundary and the alteration of the position of the entrance ramp, which has been moved further North, away from neighbouring properties.
 - Feedback relating to parking has led to the confirmation that new residents will be prevented from applying for parking permits for neighbouring streets. The design will also provide a good amount of cycle parking and EV charging facilities to encourage sustainable forms of travel.
 - Feedback relating to sustainability and landscaping has led to the development of a highly sustainable scheme which significantly increases biodiversity and includes many measures to reduce the environmental impact of the development.

- Feedback relating to community access have influenced the proposals for the management of green space and play space, with full public access guaranteed, opportunities for community fruit picking and the potential for local nurseries to use the play space.
- Feedback relating to the privacy and overlooking on the southern boundary has led to the retention of all existing foliage and mature trees on the boundary, with the introduction of further greening and new trees to further protect privacy. The nature and design of rooms looking towards the south also responds to the need to protect privacy.
- Feedback relating to construction management has resulted in the decision to restrict all construction traffic during school run hours and the provision of traffic marshals at key locations along the route, to ensure that the junction at South Worple Way and White Hart Lane can be navigated safely.
- Feedback relating to deliveries and servicing has led to the creation of a new management suite to manage deliveries and the provision of good-sized off-road servicing bays to ensure South Worple Way is not impeded by deliveries.
- Feedback relating to concerns about flooding has resulted in new proposals which will significantly improve surface water management when compared to the existing site and the consented scheme.
- As there is a requirement to develop the site in line with the London Plan's housing targets, we have sought to respond to concern about the increased density of the development by delivering the majority of additional homes within the consented envelope of the buildings, by optimising internal layouts, and ensuring that any additional height is no higher than the existing buildings.

Design Evolution

4.9. At each stage of the pre-application and community engagement process the design team has sought to respond to comments raised and further refine the scheme accordingly. A detailed summary of how the design has evolved to take account of feedback received can be found in the accompanying Design & Access Statement, however by way of summary some of the key changes during this process have included:

- An additional storey added to Block's B and C while Block A will remain as per the consented OPP at 3 storeys to protect the setting of the retained BTMs in the northern part of the site.

- The central entrance to the site has been amended to only allow access for pedestrians, cyclists, and emergency vehicles.
- All wheelchair accessible units have been located to the ground floor of the blocks to ensure easy access and egress for future occupiers.
- The roof form and design has been revised including reducing the size and number of the dormer windows from the pre-application proposals and including slate teils for the roof.
- Variation in the brick materiality for each of the blocks has been introduced.

5. Proposed Development

5.1. Full details of the Proposed Development are contained in the accompanying Design and Access Statement prepared by Scott Brownrigg Architects. The key points are summarised in this section.

5.2. This application is seeking full planning permission for:

“Demolition of existing structures and redevelopment of site including construction of three new buildings comprising residential units of mixed tenure (Use Class C3), conversion of two existing buildings for residential use (Use Class C3), car and cycle parking, landscaping and associated works.”

5.3. The design of the proposals has evolved from a review of the residential parameter plans approved as part of the OPP. The proposed floorplates have been revised to improve the efficiency and quality of the residential layouts and units. As part of extensive engagement with local stakeholders and the Council (see Section 4) the proposals were further refined to moderately increase the massing in areas where there would be no harmful townscape or heritage impacts in order to fully optimise the site and secure the delivery of high quality dwellings and affordable housing in line with the aims of national, regional and local policy and guidance.

5.4. The Proposed Development is considered to be an optimisation and improvement over the consented residential part of the OPP.

Design, Height, Scale and Massing

5.5. Three new buildings are proposed, following the layout and built form that was approved as part of the OPP for this part of the site.

5.6. Blocks B and C are located in the southern part of the site and are 4 storeys in height (ground plus 3 storeys). Block A is located in the north-western part of the site and will be 3 storeys in height (ground plus 2 storeys). An undercroft is proposed that runs on a north-south axis underneath Blocks A and B which provides car parking, cycle parking, refuse stores, plant and bulky storage.

5.7. Two BTMs, the Former Recreation Hall and the Entrance Lodge, are to be retained in the northern part of the site. Three residential units are proposed within these buildings, with a concierge, post room and a residential amenity/workspace located within the ground floor of the Entrance Lodge.

5.8. The extent of the proposals total 10,799 sqm (GIA), including the 185sqm located within the existing BTMs and the undercroft.

5.9. The design of the proposals has been heavily influenced by the design code that was approved as part of the OPP. While this application is separate from the OPP, the applicant has sought to deliver the same high-quality design set out in the code and following input from LBRuT Urban Design and Conservations Officers in order to best respond to the surrounding character.

5.10. Key features of the design include:

- Variation in the brick materiality for each of the blocks with the main brick in stretcher bond and decorative contrasting brick types proposed within the gables at roof level;
- Soldier course detail above the windows to be in a contrasting brick type;
- The roof to be built from slate tiles;
- Inclusion of gables and dormer windows to break up the roof form;
- Residential balconies to be constructed out of bronze metalwork;
- Stone detailing elements to be used for the window sills;
- Triple aspect full height bay windows to maximise the daylight levels; and
- Entrance ways to include glazed double doors in dark grey metal frames with a metal cladding canopy.

Residential Units and Affordable Housing

5.11. A total of 109 residential units are proposed with a mix of 1 bed to 3 bed units including a 21% family sized unit provision in the affordable rent tenure and a 17% family sized unit provision overall. The breakdown of the accommodation by unit size and tenure is provided in the table below.

Unit Size	Market		Shared Ownership		Affordable Rent		Total	
	Units	%	Units	%	Units	%	Units	%
Studio	1	1.2%	0	0%	0	0%	1	0.9%
1-bedroom	29	34.1%	5	100%	7	36.8%	41	37.6%
2-bedrooms	41	48.2%	0	0%	8	42.1%	49	45%
3-bedrooms	14	16.5%	0	0%	4	21.1%	18	16.5%
Total	85	100%	5	100%	19	100%	109	100%

Table 1 - Residential Unit Sizes and Tenures

5.12. A total of 22% affordable housing is provided by unit with a tenure split of 79% affordable rent and 21% intermediate units. This is in accordance with the overall provision approved within the OPP and

an improvement on the OPP tenure split, which broadly accords with the 80/20 affordable/intermediate tenure split requirement (see Section 7).

- 5.13. The Proposed Development would deliver a total of 19 affordable rent units and 5 shared ownership units, representing an additional 5 and 1 units respectively than the OPP. It should be noted that all of the 2-bed affordable housing units are 2-bed 4-person units, and therefore in total the Proposed Development comprises 12 affordable family sized units.
- 5.14. The proposed unit size mix is broadly consistent with the OPP total unit size mix that was considered acceptable (OPP: 36% 1-bed, 47% 2-bed, 17% 3-bed). The proposals provide a higher proportion of family sized dwellings in the affordable rent tenure than the OPP, delivering 21% 3-bed units in this tenure versus 14% 3-bed units within the OPP.

Residential Quality, Amenity Space and Playspace

Space Standards & Wheelchair Units

- 5.15. All of the residential units meet or exceed the Nationally Described Space Standards.
- 5.16. 90% of the proposed homes comply with M(4)2 requirements while the remaining 10% of the proposed units are wheelchair accessible, complying with M(4)3 requirements. All the wheelchair accessible units are located on the ground floor to provide the most convenient accessibility for future residents. A total of 11 units are proposed as M4(3) wheelchair accessible of which nine are 1-bed units, one is a 2-bed unit and one is a 3-bed unit. Two of the wheelchair accessible units are located within the affordable rent tenure in the form of 1-bed 2-person units.

Daylight & Sunlight

- 5.17. Thorough daylight and sunlight analysis has been undertaken (see accompanying Daylight & Sunlight Report, prepared by XCO2), and the layouts have been designed to ensure excellent levels are achieved for each residential unit, maximising the numbers of dual aspect units while working within the constraints of the site.
- 5.18. A total of 47% of the proposed units are dual aspect and none of the single aspect units are north facing.

Amenity Space

- 5.19. The proposals include extensive levels of useable external amenity space across the site, totalling 4,666sqm across the site, a significant improvement over the existing 250sqm. Further details of the specific landscaped character areas are set out below.
- 5.20. 78 of the 109 units have access to private amenity space in the form of balconies or gardens. All of these private amenity spaces meet or exceed the minimum London Plan standards with 5 or more sqm provided for the 1 bed units, 7 or more sqm for the 2 bed units and 8 or more sqm for the 3 bed units.
- 5.21. A total of 31 units do not have access to private amenity space, however, these are predominantly the 1-bed units in the market tenure. This is considered acceptable given the agreed constraints of the OPP design code which it was agreed at pre-application stage should still form the basis for the revised design. Indeed, it is noted that the Committee Report (Paragraph 119) for the OPP stated that:
- “No details have been provided but the Design Code clarifies that private external amenity space would be provided around the perimeter and in between the residential blocks. It is however reasonable to assume that most residential units would only benefit from a communal amenity space around and in between the residential blocks. No in principle concerns are raised to this approach and it is considered that there is sufficient space within the site to accommodate an appropriate level of provision for the residential units and so this matter can be dealt with through the reserved matters.”*
- 5.22. The proposals are therefore considered an improvement over the OPP, providing 71.5% of units with private amenity, whereas the OPP was anticipated to deliver communal amenity space for most units and private amenity space only for the minority.

Playspace

- 5.23. The proposals include on-site playspace provision for age ranges 0-5yrs and 5-11yrs, in excess of the requirements calculated using the GLA Population Yield Calculator for those ages. As set out in the Exterior Architecture Design and Access Statement, the 12+ provision can be accommodated on-site, however, is not proposed on-site given the aim to preserve the ecological benefits of the wildlife corridor in the south of the site that was approved as part of the OPP. A contribution in lieu is proposed as previously secured through the OPP and set out in Section 9 of this Statement.
- 5.24. The table below sets out the proposed on-site playspace provision versus the required levels.

Age	Required Playspace (sqm)	Proposed Playspace (sqm)
0-5 years	245	250
5-11 years	182.6	185

Total	544	553
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Table 2 - Playspace Provision

Landscaping and Ecology

5.25. The proposals include high quality landscaping throughout the development with five different landscaped and ecological character areas. These include:

- The Orchard Garden – a central landscaped area to act as a community anchor that will include productive orchard tree planting, bird baths and seating opportunities.
- The Long Border Garden – located between Blocks B and C, this provides a functional space to allow for pedestrian circulation and also allows for spaces along the journey to stop, meet, rest, think, relax and socialise. The immersive tree planting and verdant planting typology makes this garden an inviting place to rest. The Eco Walk – located on the southern boundary and running on an east-west axis, this eco walk primarily acts as a dark wildlife corridor...
- The Grow Gardens – located to the west of Block B, this is a productive community garden space for residents to meet, explore, learn and play. Creating a playful and fun space to enjoy productive planting will be the driving force behind the layout of this character area.
- The Play Garden – located between Blocks A and B, provides inclusive, green, and immersive play opportunities that fit seamlessly into the already verdant landscape. The aim is to create a sense of discovery and exploration is at the heart of this character area.
- The Eco Walk – located on the southern boundary of the site, this creates an inviting and green link with high ecological value and sense of discovery. Incorporating a nature trail and immersive board walks adds to the sense of exploration in this space.

5.26. The proposals include the removal of 6 numbers of trees. This is offset by the retention of 22 existing trees and the provision of a further 64 new trees being proposed as part of the landscaping and arboricultural strategy.

5.27. The proposals will enhance the existing site significantly, replacing the existing hard standing with high-quality planting, landscaping and ecological measures including bird and bat boxes. The proposals will therefore provide an overall benefit and net gain to biodiversity and achieve an Urban Green Factor ('UGF') of 0.49.

Transport and Servicing

Car Parking

- 5.28. A total of 50 car parking spaces are proposed at a ratio of 0.46 spaces per dwelling. 43 of these spaces are provided within the undercroft with a further 7 provided at grade in the north western part of the site, adjacent to the access route from South Worple Way.
- 5.29. A total of 11 disabled accessible parking bays are proposed, 7 within the undercroft and 4 as part of the at grade spaces. This represents a provision of 10% of the units having access to wheelchair accessible parking.
- 5.30. 11 of the total number of car parking spaces (22%) will be provided with active electric vehicle charging points while the remainder (78%) will have passive charging infrastructure.

Cycle Parking

- 5.31. Cycle storage is provided at ground level within Block C and within the undercroft for Blocks A and B. A total of 197 long-stay and 8 short-stay cycle parking spaces are proposed in line with London Plan standards.
- 5.32. Of these cycle parking spaces, 8 are proposed as larger spaces for cargo bikes and adapted cycles the 8 short-stay spaces (4 Sheffield style stands) provided externally within the landscape for visitors.

Waste, Deliveries and Servicing

- 5.33. Refuse stores are provided for Blocks A and B within the undercroft, within or adjacent to their respective cores. Block C's refuse store is provided at ground level within the block adjacent to the cycle parking store.
- 5.34. Within the north-eastern part of the undercroft a space has been allocated for a refuse collection tractor which will be used to collect the refuse bins and transport them to the bin collection store located in the north-western most corner of the site adjacent to the vehicle access from South Worple Way. The refuse vehicle will reverse from South Worple Way into the site and stop on the site access road to collect waste from the refuse store, before leaving the site in forward gear.
- 5.35. In addition to the above, a bulky storage area has been provided within the south of the undercroft. This will be accessible to all residents within the development.
- 5.36. The Proposed Development is expected to generate 14 deliveries per day, predominantly through transit type vans or small rigid lorries. Some of the delivery and servicing trips associated with the proposed development, such as post deliveries and refuse collection, will be linked to existing servicing and delivery trips already being undertaken on the street and in the local area, and therefore will not be new or additional servicing trips to the local highway network. The deliveries will be

accommodated within the temporary delivery bay proposed on South Worple Way, in front of the central access route and adjacent to the concierge facility where packages will be dropped off.

- 5.37. Emergency vehicle access is provided for through the central access route on the eastern part of the site where removable bollards will be located. At all other times, the central access point will only be for pedestrians and cyclists.

Sustainability and Energy

- 5.38. The Proposed Development has been carefully designed with sustainability and energy efficiency in mind. The energy strategy for the site follows the Mayor's energy hierarchy: 'Be Lean, Be Clean, Be Green, Be Seen' as detailed in the London Plan. The proposed energy measures in accordance with this are as follows:

1. Be Lean: The Development has taken a 'fabric first' approach to reducing energy demand and CO2 emissions, alongside other energy efficient measures including: optimising the orientation and site layout, communal heating system incorporating low carbon technologies and renewables, high efficiency plant, highly insulated low temperature distribution systems, high efficiency low level lighting, heat recovery ventilation, waster water heat recovery and active control systems.
2. Be Clean: An option study has been undertaken into the preferred method of providing heating and water, balancing energy and emission requirements against capital and running costs. There is also a consideration to make the buildings 'zero carbon' enabled with no burning of fossil fuels on site and allowing the building to have lower emissions associated with it as the electrical grid becomes greener. For the above reasons combined heat and power plant have been excluded. As no CHP is proposed the 'Be Clean' stage results within the GLA worksheet is identical to that of the 'Be Lean' stage.
3. Be Green: It is proposed that Air Source Heat Pump (ASHP) plant is accommodated within a plant enclosure on the roof of Block A and utilised to provide space heating and domestic hot water to the residential apartments.
4. Be Seen: Energy monitoring shall be provided within the central plant BMS and tenants HIU's as listed below. This shall allow detailed information for the plant operation and energy data to be logged and collated and used to inform the management and efficient operation of the installation. Monitoring will be in accordance with the requirement laid out in the GLA Energy Monitoring Guidance (April 2020). For example, a commitment to

monitor operational performance for 5 years post completion and to upload this data to an online portal (when available).

- 5.39. An overall reduction in regulated CO2 emissions of 36% compared with the Building Regulations Part L (2013) 'baseline' is estimated to be achieved when accounting for the benefits attained through passive design, energy efficiency, and low carbon technologies. An 11% reduction in regulated emissions is achieved through efficiency measures alone (Be Lean).

6. Planning Policy Context

6.1. The Proposed Development has been prepared in the context of relevant policy and guidance at the national, regional and local levels. This section of the Planning Statement sets out the policy framework against which the scheme is subsequently assessed in Section 7.

Adopted Planning Context

6.2. In accordance with Section 38(6) of the Planning and Compulsory Act (2004), planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise. The adopted development plan for the Application comprises:

- The London Plan (2021); and
- The London Borough of Richmond upon Thames Local Plan (2018) (hereafter referred to as 'the Local Plan').

6.3. Key material considerations of relevance to the determination of this planning application also include:

- The National Planning Policy Framework (NPPF) (2021), which 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.
- National Planning Practice Guidance (NPPG), which comprises further advice on the implementation of national planning policies and statutory regulations in the form of an online resource, updated periodically.
- Supplementary planning guidance (SPG), published by the Mayor of London at the regional level, including the Mayoral Housing SPG (2016) and the Play and Informal Recreation SPG (2012).
- Supplementary planning documents (SPD), published by LBRUT, including the Air Quality SPD (2020), the Affordable Housing SPD (2014), the Buildings of Townscape Merit SPD (2015), the Design Quality SPD (2006), Planning Obligations SPD (2020), the Refuse and Recycling Storage Requirements SPD (2015), the Residential Development Standards SPD (2010) including the Technical Update (2015), the Transport SPD (2020), and the Sustainable Construction Checklist SPD (2020).

- The OPP and the approved Design Code are also considered material considerations in the decision-making process.

Emerging Policy Context

6.4. The Mayor is preparing further supplementary guidance that has been considered as part this Statement. The following Draft SPGs have been included having undergone consultation between 13th October 2020 – 15th January 2021:

- Draft Circular Economy Statement Guidance (October 2020)
- Whole Life-Cycle Carbon Assessments Guidance (October 2020)
- Be Seen Energy Monitoring Assessments Guidance (October 2020)

6.5. In addition to the above, the Draft Energy Assessment Guidance (April 2020) has also been considered.

Site Designations

6.6. The site is located within the following designations:

- Site Allocation: SA28 Barnes Hospital, East Sheen;
- PTAL 4;
- Flood Zone 1.

6.7. The site is not located within a Conservation Area, nor does it contain any statutory listed buildings. The Queens Road (Mortlake) Conservation Area (CA 35) is immediately adjacent to the west of the site while the Cowley Road Conservation Area (CA 79) is located to the north of the site across South Worple Way and the railway line. There are five locally listed Buildings of Townscape Merit ('BTMs'), of which three were agreed to be removed as part of the OPP with two of the BTMs in the north of the site being retained. The cemetery to the west of the site is designated as Other Open Land of Townscape Importance, ('OOLTI') and an Other Site of Nature Importance ('OSNI').

6.8. The adopted site allocation (SA28) makes the following provisions:

"It is acknowledged that the mix of uses on this site will depend on the Mental Health Trust's decision on how much of the site they need to retain for their own future needs.

- *There is a clear need for a new Special Education Needs school in this area as set out in the Council's updated School Place Planning Strategy. Therefore, the Council expects any redevelopment proposal to prioritise the provision of the educational use.*
- *Appropriate land uses include social and community infrastructure uses (including education). The possibility of locating primary and/or community health services on this site should be investigated.*
- *Only if community and social infrastructure uses have been explored and options discounted in line with other policies in this Plan, would the provision of housing (including affordable housing) and potential for extra-care housing, be considered as a potential redevelopment option."*

7. Planning Assessment

7.1. This section assesses the Proposed Development against the relevant planning policies. The following key planning considerations are assessed in turn:

- a) Principle of Development
- b) Land Use Principle
- c) Residential Mix
- d) Affordable Housing
- e) Quality of Residential Accommodation
- f) Height, Scale and Massing
- g) Design, Heritage and Conservation
- h) Open Space, Playspace and Amenity Space
- i) Transport and Servicing

(a) Principle of Development

Policy Summary

7.2. The redevelopment of the site is supported in policy terms by the National Planning Policy Framework (2021), which adopts a presumption in favour of sustainable development and encourages the effective use of brownfield land.

7.3. Paragraph 120 of the NPPF (2021) states planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.

7.4. London Plan (2021) Policy GG2 'Making the best use of land' states that, to create successful sustainable mixed-use places that make the best use of land, those involved in planning and development must enable the development of brownfield land, including utilising small sites, along with proactively exploring the potential to intensify the use of land to support additional homes and

workspaces, promoting higher density development, and applying a design-led approach to determine the optimum development capacity of sites.

- 7.5. Local Plan Policy LP 28 'Social and Community Infrastructure' states that the loss of social or community infrastructure will be resisted unless it can be clearly demonstrated:

"1. that there is no longer an identified community need for the facilities or they no longer meet the needs of users and cannot be adapted; or

2. that the existing facilities are being adequately re-provided in a different way or elsewhere in a convenient alternative location accessible to the current community it supports, or that there are sufficient suitable alternative facilities in the locality; and

3. the potential of re-using or redeveloping the existing site for the same or an alternative social infrastructure use for which there is a local need has been fully assessed. This should include evidence of completion of a full and proper marketing exercise of the site for a period of at least two consecutive years."

Assessment

- 7.6. The principle of the redevelopment of this brownfield site was accepted through the approval of the OPP (ref. 18/3642/OUT).
- 7.7. The loss of the existing C2 healthcare use was considered acceptable. The Healthcare Trust's relinquishing of the site and re-provision of the facilities elsewhere through their Estate Modernisation Programme (EMP) were considered to meet the requirements of criteria 1 and 2 of Policy LP 28 as above. The marketing evidence was then considered acceptable in meeting the requirements of criteria 3 above, demonstrating that there was no demand for the site to be re-used for the same or alternative social infrastructure use.
- 7.8. Following the approval of the OPP, the site has been sold by the Trust to the Applicant to be brought forward in residential use.
- 7.9. The proposals will redevelop this otherwise vacant brownfield site, delivering significant levels of housing and affordable housing in accordance with the aims of the NPPF London Plan Policy GG2 as set out above.
- 7.10. The principle of redeveloping the site is therefore considered wholly acceptable as established through the OPP.

(b) Land Use Principle

Policy Summary

- 7.11. The NPPF seeks to boost the supply of homes where they are needed to meet the needs of groups with specific housing requirements having regard to the size, type and tenure of housing needed for different groups in the community (paragraph 62). Paragraph 119 of the NPPF (2021) states: *'Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.'*
- 7.12. London Plan Policy GG4 'Delivering the homes Londoners need' seeks to ensure those involved in planning and development ensure that more homes are delivered. Policy H1 'Increasing housing supply' requires that boroughs should *"optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions"* and in particular for sites with PTAL ratings of 3-6 or which are located within 800m distance of a station or town centre boundary. Table 4.1 of the London Plan sets 10 year targets for housing completions with LBRUT needing to provide 4,110 homes within this period.
- 7.13. Local Plan Policy LP 34 'New Housing' sets LBRUT's target homes requirement as 3,150 homes for the period 2015-2025. This target will be rolled forward until it is replaced by a revised London Plan target. The Council will exceed the minimum strategic dwelling requirement, where this can be achieved in accordance with other Local Plan policies.

Assessment

- 7.14. The proposed residential use for the site was accepted and approved as part of the OPP.
- 7.15. The proposals are in accordance with the adopted site allocation (SA28) which makes provision for residential use coming forwards on the site:

"Only if community and social infrastructure uses have been explored and options discounted in line with other policies in this Plan, would the provision of housing (including affordable housing) and potential for extra-care housing, be considered as a potential redevelopment option."

- 7.16. Alternative community and social infrastructure options have been discounted as set out above and therefore the provision of residential housing is supported in this location.
- 7.17. The proposals will deliver 109 residential units, 26 more than the OPP, on a brownfield site with good levels of public transport accessibility evidenced through the PTAL of 4. The application seeks to optimise the residential use approved under the OPP which was considered an under utilisation of

the site and will thereby deliver greater levels of both market and affordable housing in a range of unit sizes in this brownfield location in accordance with the NPPF and London Plan Policy H1.

7.18. The proposed development will deliver additional housing and contribute to the strategic housing targets set out in the London and Local Plan.

7.19. In accordance with the NPPF, significant weight should be given to the value of developing brownfield land in meeting housing need. The principle of the optimisation of the residential use is therefore supported by the NPPF, London Plan Policies GG4 and H1 and Local Plan Policy LP 34, all of which seek to increase the delivery of housing in suitable brownfield locations to meet the needs of Londoners.

(c) Residential Mix

Policy Summary

7.20. The NPPF requires local planning authorities to deliver a wide choice of high-quality homes and to plan for a mix of housing in terms of size, type, tenure and range based on local demand (Para 61 & 62).

7.21. London Plan Policy H10 'Housing size mix' sets out that schemes should generally consist of a range of unit sizes. The appropriate mix should be determined having regard to robust local evidence of need, the nature and location of the site and the aim to optimise housing potential on sites. Applicants and decision makers should have regard to:

- *"The nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity.*
- *The aim to optimise housing potential on sites.*
- *The need for additional family housing and the role of one and two bed units in freeing up existing family housing."*

7.22. Local Plan Policy LP 35 'Housing Mix and Standards' requires that developments generally provide family sized accommodation and the mix be appropriate to the site-specifics of the location.

Assessment

7.23. The scheme had been designed to accord with the unit mix requirements where possible and provide much needed family housing, particularly within the affordable rent tenure. The unit mix by tenure has been set out in Table 2 below.

Unit Size	Market		Shared Ownership		Affordable Rent		Total	
	Units	%	Units	%	Units	%	Units	%
Studio	1	1.2%	0	0%	0	0%	1	0.9%
1-bedroom	29	34.1%	5	100%	7	36.8%	41	37.6%
2-bedrooms	41	48.2%	0	0%	8	42.1%	49	45%
3-bedrooms	14	16.5%	0	0%	4	21.1%	18	16.5%
Total	85	100%	5	100%	19	100%	109	100%

Table 3 - Residential Mix

7.24. The Proposed Development will deliver a range of unit sizes, maximising the number of family-sized units within the affordable rent tenure in accordance with the requirements of London Plan H10 and Local Plan Policy LP 35.

7.25. The proposed unit mix was supported by LBRuT's Affordable Housing officer at the pre-application meeting of 28th June 2021. All the 2-bed units within the affordable rent tenure are 2-bed 4-person units which was also supported by officers.

7.26. When compared with the OPP, the proposals are broadly in line with the OPP which was considered acceptable and approved with a greater proportion of 3-bed units within the affordable rent tenure than the OPP; 21% versus 14%. This is considered in greater compliance with Local Plan Policy LP 35 than the OPP whose mix was considered acceptable and approved.

7.27. Overall, therefore, a range of unit sizes is provided with a greater provision of family housing in the affordable rent tenure in accordance with the London Plan Policy H10 and Local Policy LP 35.

(d) Affordable Housing

Policy Summary

7.28. London Plan Policy H4 'Delivering affordable housing' states that the strategic target is for 50 per cent of all new homes delivered across London to be genuinely affordable. Major developments which trigger affordable housing are required to provide affordable housing through the threshold approach set out under Policy H5.

7.29. London Plan Policies H5 'Threshold approach to applications' and H6 'Affordable housing tenure' state that developments on non-public sector land may qualify for the fast-track route should 35% affordable housing be provided and subject to the following criteria being met:

- Meeting the following tenure requirements: 30% as low cost rented including social rent, 30% intermediate with the remaining 40% to be determined by the Local Planning Authority based on identified need.
- Meet other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor where relevant.

7.30. Local Plan Policy LP 36 'Affordable Housing' states that the Council expects 50% of all housing units will be affordable housing with an 80/20 affordable/intermediate tenure split. The affordable housing mix should reflect the need for larger rented family units and the Council's guidance on tenure and affordability, based on engagement with a Registered Provider to maximise delivery. *"Where on-site provision is required, an application should be accompanied by evidence of meaningful discussions with a Registered Provider which have informed the proposed tenure, size of units and design to address local priorities and explored funding opportunities."* The policy states that when seeking the maximum reasonable amount of affordable housing, the Council will have regard viability and where the above standards are not met, applicants should provide a viability assessment.

Assessment

7.31. The proposed development includes an affordable housing provision of 22% which is in line with the OPP approved levels. While below the strategic aim of 50%, a financial viability assessment has been prepared by Savills and submitted as part of this application which supports the 22% proposal as the maximum reasonable provision. The Applicant acknowledges that an independent financial review will take place through the determination of the application.

7.32. The proposed tenure split of 79% affordable rented and 21% intermediate housing is in line Local Policy LP 36 requirements of an 80/20 affordable/intermediate tenure split and is therefore considered acceptable.

7.33. The applicant has complied with the additional requirements of Policy LP 36 regarding meaningful engagement with Registered Providers ('RPs'). The following RPs were approached for input and comment:

- Richmond Housing Partnership;
- Inquilab (working with L&Q);

- Metropolitan Thames Valley; and
- Paragon Asra.

7.34. As set out in the viability report, the Richmond Housing Partnership have provided an offer for the affordable housing proposed and have confirmed their support for the design of the scheme. This meaningful engagement with RPs is in accordance with Local Plan Policy LP 36.

7.35. It is noted that for the period FY2016 to FY2018, LBRuT delivered only 37% of the affordable homes target met. The Proposed Development improves on the number of affordable units which can be delivered on the site and therefore will contribute to meeting this identified need.

(e) Quality of Residential Accommodation

Policy Summary

7.36. London Plan Policy D5 'Inclusive design' requires that development proposals achieve the highest standards of accessible and inclusive design. Policy D6 'Housing Quality and Standards' requires that developments achieve high quality design and provide adequately-sized rooms in accordance with the standards set out within the policy and in Table 3.1. The policy further requires:

"C Housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of Part B in Policy D3 Optimising site capacity through the design-led approach than a dual aspect dwelling, and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.

D The design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.

E Housing should be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables (for at least card, paper, mixed plastics, metals, glass) and food waste as well as residual waste."

7.37. London Plan Policy D7 'Accessible Housing' states that residential developments must ensure:

"1) at least 10 per cent of dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(3) 'wheelchair user dwellings'

2) all other dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'."

7.38. Local Plan Policy LP 35 requires that all units comply with the Nationally Described Space Standards, provide adequate external and amenity space, and deliver 90% of all new build housing to Building Regulation Requirement M4 (2) standards and 10% to Building Regulation Requirement M4 (3) standards.

Assessment

7.39. All the proposed units all across all tenures meet or exceed the minimum space and storage standards set out in London Plan Policy D6.

7.40. The number of dual aspect units has been maximised as part of the design of the layouts with 47% of the units being dual aspect with none of the single aspect units facing north. This is in accordance with London Plan Policy D6 (Part C).

7.41. 90% of the proposed homes comply with M(4)2 requirements while the remaining 10% of the proposed units are wheelchair accessible, complying with M(4)3 requirements. All the wheelchair accessible units are located on the ground floor to provide the most convenient accessibility for future residents. A total of 11 units are proposed as M4(3) wheelchair accessible of which nine are 1-bed units, one is a 2-bed unit and one is a 3-bed unit. Two of the wheelchair accessible units are located within the affordable rent tenure in the form of 1-bed 2-person units.

7.42. The proposed residential units have been tested in relation to noise, daylight sunlight, amenity space, ventilation and overheating and achieve an excellent standard of accommodation. This is demonstrated within the relevant sections below.

7.43. In summary, the proposed development will achieve an excellent quality of residential accommodation in accordance with London Plan Policies D5, D6, and D7 and Local Plan LP 35.

(f) Height, Scale and Massing

Policy Summary

7.44. The NPPF requires that policies and decisions ensure that developments make the most effective use of land and make efficient use of land, ensuring that sufficient densities are provided to meet identified housing needs (Para 119 and 124).

- 7.45. Local Plan Policy LP 2 'Building Heights' requires developments to respect and strengthen the setting of the borough's valued townscapes and landscapes, through appropriate building heights. New buildings will need to make a positive contribution towards the local character, townscape and skyline, generally reflect the prevailing building heights within the vicinity and where taller than the surrounding townscape, be of high architectural design quality and deliver public realm benefits. In addition, proposals should preserve and enhance local heritage assets and take account of climate effects including overshadowing, wind speeds, heat island and glare.
- 7.46. Supporting text paragraph 4.2.3 defines 'Taller Buildings' as those being significantly taller than the neighbouring buildings, but less than 18 metres in height (below six storeys) and 'Tall Buildings' as 18 metres in height or higher.

Assessment

- 7.47. The Proposed Development, with a maximum height of ground plus three storeys (14.18m) does not qualify as a tall building under London Plan or Local Plan standards. The proposals, albeit slightly taller than the surroundings at their highest point are not considered as significantly taller than their surroundings and would therefore not be defined as 'taller buildings' as set out under Local Plan Policy LP 2.
- 7.48. The proposals optimise the site to ensure the suitable use of the site and achievement of appropriate densities in accordance with the NPPF. This is achieved through increasing the heights of Blocks B and C by a storey above the OPP.
- 7.49. The tallest element of the proposals is consistent with the tallest point of the existing buildings. Furthermore, the design of the roof form with steep gables, helps break-up the massing and reduce the sense of scale while ensuring the roofscape is of a high quality design while respecting the skyline.
- 7.50. The height, scale and massing has been extensively tested and revised through the pre-application process with officers and the impacts of the increase in height beyond the OPP scheme on the character of the surrounding streets, conservation area, BTMs and the designated OOLTI cemetery to the west has been extensively tested and found to be acceptable in accordance with the requirements of Local Plan Policy LP 2.
- 7.51. Block A has been maintained at three storeys in height in order to minimise the townscape impact on the BTMs in the north of the site, while also creating variation in the heights when viewed from the west from the cemetery with Block B to the south being four storeys. This helps reduce the sense of mass from the Proposed Development when considered from this view.

- 7.52. These views have been tested within the Heritage and Townscape Visual Impact Assessment that has been prepared by Montagu Evans. The Assessment concludes that *“there would be no harm to the local townscape character arising from the changes which are proposed to the OPP in this application. The proposals would achieve the re-use of the land and its development with complementary uses in line with the OPP, and the proposals would introduce high quality and attractive architecture to the area which would improve the townscape amenity.”*
- 7.53. The proposals are therefore considered in compliance with the NPPF and Local Plan Policy LP 2.

(g) Design, Heritage and Conservation

Policy Summary

- 7.54. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that when considering whether to grant planning permission for development which affects a listed building or its setting, the decision maker shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 7.55. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 also provides that, in respect of development affecting conservation areas, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.
- 7.56. The NPPF (2021) (Paragraph 194) requires that sufficient evidence be provided regarding the heritage significance of the relevant buildings and their contribution to the character and appearance of the conservation area in order to assess the proposed development.
- 7.57. Paragraph 134 of the NPPF emphasises how significant weight should be given to ‘outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings’.
- 7.58. Paragraph 126 of the NPPF states that the ‘creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve.’ Paragraph 129 require that local planning authorities prepare design guides or codes which reflect local character and design preferences. ‘Design guides and codes provide a local framework for creating beautiful and distinctive places with a consistent and high quality standard of design. Their geographic coverage, level of detail and degree of prescription should be tailored to the circumstances and scale of change in each place, and should allow a suitable degree of variety.’

- 7.59. London Plan Policy HC1 'Heritage conservation and growth' requires development proposals affecting heritage assets and their settings to conserve their significance, considering the cumulative impacts of incremental change.
- 7.60. London Plan Policy D3 'Optimising site capacity through the design-led approach' requires developments to be of high architectural quality, pay attention to detail and respect and enhance the architectural features that make up the local character.
- 7.61. Local Plan Policy LP 1 'Local Character and Design Quality' states that the *"Council will require all development to be of high architectural and urban design quality. The high quality character and heritage of the borough and its villages will need to be maintained and enhanced where opportunities arise. Development proposals will have to demonstrate a thorough understanding of the site and how it relates to its existing context, including character and appearance, and take opportunities to improve the quality and character of buildings, spaces and the local area."*
- 7.62. The Policy requires that all developments be tested against the following criteria:
- 1. compatibility with local character including the relationship to existing townscape, development patterns, views, local grain and frontages as well as scale, height, massing, density, landscaping, proportions, form, materials and detailing;*
 - 2. sustainable design and construction, including adaptability, subject to aesthetic considerations;*
 - 3. layout, siting and access, including making best use of land;*
 - 4. space between buildings, relationship of heights to widths and relationship to the public realm, heritage assets and natural features;*
 - 5. inclusive design, connectivity, permeability (as such gated developments will not be permitted), natural surveillance and orientation; and*
 - 6. suitability and compatibility of uses, taking account of any potential adverse impacts of the co-location of uses through the layout, design and management of the site."*
- 7.63. Local Plan Policy LP 3 'Designated Heritage Asset' requires development to conserve and, where possible, take opportunities to make a positive contribution to, the historic environment of the borough. Development proposals likely to adversely affect the significance of heritage assets will be assessed against the requirement to seek to avoid harm and the justification for the proposal.

- 7.64. Local Plan Policy LP 4 'Non-Designated Heritage Assets' states that the Council will seek to preserve, and where possible enhance, the significance, character and setting of non-designated heritage assets and that there will be a presumption against the demolition of Buildings of Townscape Merit.
- 7.65. Local Plan Policy LP 5 'View and Vistas' states that the Council will protect the quality of the views, vistas, gaps and the skyline, all of which contribute significantly to the character, distinctiveness and quality of the local and wider area and will seek improvements to views within and out of conservation areas.
- 7.66. Local Plan Policy LP 14 'Other Open Land of Townscape Importance' states that OOLTI's will be protected and enhanced where possible. *"Improvement and enhancement of the openness or character of other open land and measures to open up views into and out of designated other open land will be encouraged. When considering developments on sites outside designated other open land, any possible visual impacts on the character and openness of the designated other open land will be taken into account."*
- 7.67. The East Sheen Village Planning Guidance SPD sets out various design aims that developments for the Barnes Hospital site should consider. These are:
- The protection and enhancement of the existing character of the site and its positive contribution to the area and adjacent Queens Road Mortlake Conservation Area.
 - The retention and reuse of the Buildings of Townscape Merit (BTMs).
 - The retention of the boundary wall to South Worple Way.
 - The retention and protection of existing mature trees subject to Tree Preservation Order.
 - Enhancing the biodiversity of the site and adjacent cemetery.
 - Density, layout and height of buildings to be in keeping with the character of the area.
 - Minimise and mitigate impact on the local highway network, and in particular the impacts on the junction with White Hart Lane and ensure a safe pedestrian environment.

Assessment

- 7.68. There are no listed buildings located within the site or located within the immediate vicinity of the site.
- 7.69. The proposals are of the highest architectural quality in accordance with the requirements of the NPPF, London Plan Policy D3 and Local Plan Policy D1. Furthermore, the design has had close regard

to the Design Code prepared for the site as part of the OPP in accordance with the aims of paragraph 128 of the NPPF.

7.70. The Heritage and Townscape Visual Impact Assessment has assessed all the proposals against all of the local heritage assets including the conservation area, BTMs and OOLTI. The Assessment concludes that *“that the changes to the OPP residential development would introduce no change to, or harmful, impact on the assessment of effects arising from the OPP.”*

7.71. Furthermore, *“No harmful effects to CAs [Conservation Areas] was identified in the Committee Report for the OPP, and the adjustment to the massing [from the OPP scheme] would not introduce an overbearing or dominant impact on views out of the CAs. The ability to appreciate their special interest would be preserved.*

The effect on the local townscape character, which is synonymous in part with the heritage interests, would likewise be preserved, and enhanced as a result of the benefits that would be delivered to the area through the complementary new use and function of the area and attractive architecture. It is noted that the proposed architecture closely follows the Design Code approved with the OPP...

In conclusion, the proposals demonstrate accordance with historic environment and townscape policy at the national and local level, and represent the opportunity for benefits to the optimisation of land in the area and will secure the introduction of high quality architecture.”

7.72. The proposals are therefore in accordance with London Plan Policy HC1 and D3 and Local Plan Policies LP 1, LP 3, LP 4, LP 5 and LP 14. In addition, the proposed development is compliant with the aims of the East Sheen Village Planning Guidance being in keeping with the design, character and density of the surrounding area, preserving the existing boundaries and mature trees where possible, retaining two BTMs in the northern part of the site as agreed through the OPP, enhancing the biodiversity on-site through the removal of approximately 1,000sqm of hardstanding and introduction of high quality landscaping and planting, preserving the significance of the conservation areas, and encouraging sustainable modes of transport through the overprovision of cycle parking and electric vehicle charging.

(h) Open Space, Playspace and Amenity Space

Policy Summary

7.73. London Plan Policy D6 ‘Housing quality and standards’ requires new residential development to provide play and informal recreation space, based on the expected child population generated by the

scheme and an assessment of future needs. London Plan Policy S4 'Play and informal recreation' requires that developments provide at least 10sqm of playspace per child that:

- a) *Provides a stimulating environment*
- b) *Can be accessed safely from the street by children and young people independently*
- c) *Forms an integral part of the surrounding neighbourhood*
- d) *Incorporates trees and/or other forms of greenery*
- e) *Is overlooked to enable passive surveillance*
- f) *Is not segregated by tenure*

7.74. The Play and Informal Recreation SPG (2012) states that formal play provision should normally be made on-site and in accordance with Development Plans' play policies for the area. Off-site provision, including the creation of new facilities or improvements to existing provision, secured by an appropriate financial contribution, may be acceptable where it can be demonstrated that it addresses the needs of the development whilst continuing to meet the needs of existing residents. Paragraph 3.8 of the Play SPG advises that in new developments, the use of roofs and terraces may provide an alternative to ground floor open space where they are safe, large enough, attractive and suitable for children to play. Careful consideration should be given to these options, including the need for supervision and any restrictions that this might put on the use of the facilities.

7.75. Policy D6 also requires that a minimum of 5 sqm private outdoor space should be provided for 1-2 person dwellings and an extra 1 sqm should be provided for each additional occupant. The minimum depth and width for all balconies and other private external spaces should be 1,500mm.

7.76. Local Plan Policy LP 31 'Public Open Space, Play Space, Sport and Recreation' states that the "Council will require all major development proposals in the borough to meet the Public Open Space, play space, and playing fields and ancillary sport facilities needs arising out of the development by requiring the following:

1. Public Open Space: applicants should provide an analysis of existing open space provision in line with the Council's accessibility standards for travel to open spaces. Where there is inadequate existing provision and limited access to such facilities, publicly accessible facilities will be expected on site to mitigate the impacts of the new development on existing provision.

*2. **Play space:** applicants should provide a play and child occupancy assessment to determine whether the proposal will lead to an estimated child occupancy of ten children or more, by using the Council's child yield calculator as set out in the Planning Obligations SPD. In addition, an assessment of existing play facilities within the surrounding area will be required. Where the assessment demonstrates an estimated child occupancy of ten children or more, the development proposal should make appropriate and adequate provision of dedicated on-site play space by following the London Plan benchmark standard of 10sqm per child. The Council will seek to integrate new major development within existing village areas and neighbourhoods. Therefore, new dedicated on-site play space should be made publicly accessible."*

7.77. Where on-site provision of public open space or playspace is not feasible or practicable, the Council will accept financial contributions in lieu.

Assessment

Amenity Space

7.78. 78 of the 109 units have access to private amenity space in the form of balconies or gardens. All of these private amenity spaces meet or exceed the minimum London Plan standards with 5 or more sqm provided for the 1 bed units, 7 or more sqm for the 2 bed units and 8 or more sqm for the 3 bed units.

7.79. A total of 31 units do not have access to private amenity space, however, these are predominantly the 1-bed units in the marketed tenure. This is considered acceptable given the agreed constraints of the OPP design code which it was agreed at pre-application stage should still form the basis for the revised design. Indeed, it is noted that the Committee Report (Paragraph 119) for the OPP stated that:

"No details have been provided but the Design Code clarifies that private external amenity space would be provided around the perimeter and in between the residential blocks. It is however reasonable to assume that most residential units would only benefit from a communal amenity space around and in between the residential blocks. No in principle concerns are raised to this approach and it is considered that there is sufficient space within the site to accommodate an appropriate level of provision for the residential units and so this matter can be dealt with through the reserved matters."

7.80. The proposals are therefore considered an improvement over the OPP, providing 71.5% of units with private amenity, whereas the OPP was anticipated to deliver communal amenity space for most units and private amenity space only for the minority.

7.81. Communal amenity space is provided throughout the development with a variety of hard and soft landscaping, planting, eco trails and grow gardens design for growing productive plants. The proposals offer a significant improvement over the existing site, with usable outdoor amenity areas and open space increasing from 250sqm to 4,666sqm. This provision will more than meet the open space needs of the proposed development in accordance with Local Plan Policy LP 31 and offer additional high-quality public amenity space to existing neighbouring residents.

Playspace

7.82. As set out in Section 5 of this Statement, the proposals include on-site playspace provision for age ranges 0-5yrs and 5-11yrs, in excess of the requirements calculated using the GLA Population Yield Calculator for those ages. As set out in the Exterior Architecture Design and Access Statement, the 12+ provision can be accommodated on-site, however, is not proposed on-site given the aim to preserve the ecological benefits of the wildlife corridor in the south of the site that was approved as part of the OPP. A contribution in lieu is proposed as previously secured through the OPP and set out in Section 9 of this Statement.

7.83. The table below sets out the proposed on-site playspace provision versus the required levels.

Age	Required Playspace (sqm)	Proposed Playspace (sqm)
0-5 years	245	250
5-11 years	182.6	185
12+ years	115.4	Off-site

Table 4 - Proposed Playspace

7.84. The playspace is exceptionally high quality, has natural surveillance from the amenity areas within the site and from the proposed residential units, is easily accessible for all children, is open to all tenures and consists of planting, soft landscaping and play equipment. Different areas of the site have been allocated for the different age categories, creating a varied and stimulating play experience appropriate for that age. The overall character and nature of these areas are as follows:

- 0-5yrs – nature trail character - very light touch play elements such as boulders, balance and stepping logs nestled within planting which double as ecological features and habitats.
- 5-11yrs – prescriptive, educational and community focussed - sculptural play elements such as climbing walls, tunnels , slides and play huts, coupled with more educational and explorative play within the grow garden.

7.85. The proposals are therefore in accordance with London Plan Policies D6 and S4, the Play and Informal Recreation SPG (2012) and Local Plan Policy LP 31, providing playspace above policy required levels

for 0-5yrs and 5-11yrs with a suitable financial contribution for the 12+ provision, providing a varied and stimulating experience appropriate for the different age ranges.

(i) Transport and Servicing

Policy Summary

7.86. London Plan Policy T1 'Strategic approach to transport' requires Development Plans and development proposals to facilitate the delivery of the Mayor's Transport Strategy (2018) which targets 80 per cent of all trips in London to be made on foot, by cycle or using public transport by 2041. London Plan Policy T2 'Healthy Streets' states that development proposals should:

"1) demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance

2) reduce the dominance of vehicles on London's streets whether stationary or moving

3) be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport."

7.87. London Plan Policy T4 'Assessing and mitigating transport impacts' states:

"When required in accordance with national or local guidance, transport assessments/statements should be submitted with development proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed. Transport assessments should focus on embedding the Healthy Streets Approach within, and in the vicinity of, new development. Travel Plans, Parking Design and Management Plans, Construction Logistics Plans and Delivery and Servicing Plans will be required having regard to Transport for London guidance.

Where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address adverse transport impacts that are identified.

The cumulative impacts of development on public transport and the road network capacity including walking and cycling, as well as associated effects on public health, should be taken into account and mitigated."

7.88. London Plan Policy T5 sets out minimum cycle parking standards which all new developments need to meet, these are: 1 space per 1-bed 1-person dwelling, 1.5 spaces per 1-bed 2-person dwelling, 2

spaces per all other dwellings, 2 short-stay spaces per the first 40 dwellings and 1 short-stay space thereafter per 40 dwellings. Policy T6.1 'Residential parking' sets out the maximum residential parking standards (0.5-0.75 spaces per 1-2 bed dwelling and 0.5-0.75 spaces per 3 bed dwelling) and requires at least 20 per cent of spaces to have active charging facilities for electric vehicles, with passive provision for all remaining spaces. For developments of 10 or more dwellings, a minimum of three per cent of dwellings should be provided with a disabled parking bay and demonstrate through a Parking Design and Management Plan, how an additional seven per cent of dwellings could be provided with one.

- 7.89. Local Plan Policy LP 24 'Waste Management' required all developments to provide adequate refuse and recycling storage space and facilities, which allows for ease of collection and which residents and occupiers can easily access, in line with the guidance and advice set out in the Council's SPD on Refuse and Recycling Storage Requirements. Major developments are required to produce site waste management plans.
- 7.90. Local Plan Policy LP 30 'Health and Wellbeing' states that the Council will support sustainable modes of transport including cycle infrastructure and seek to reduce car dependency. A Health Impact Assessment is required to be submitted for all major development proposals. Local Plan Policy LP 44 'Sustainable Travel Choices' states the *"Council will work in partnership to promote safe, sustainable and accessible transport solutions, which minimise the impacts of development including in relation to congestion, air pollution and carbon dioxide emissions, and maximise opportunities including for health benefits and providing access to services, facilities and employment."*
- 7.91. Local Plan Policy LP 45 'Parking Standards and Servicing' requires that developments provide car and cycle parking in accordance with the standards set out in Appendix 3 of the Local Plan. For all cycle parking and car parking within areas of PTAL 4 or higher, the standards defer to the London Plan requirements.
- 7.92. New major development which involves freight movements and has servicing needs will be required to demonstrate through the submission of a Delivery and Servicing Plan and Construction and Logistics Plan that it creates no severe impacts on the efficient and safe operation of the road network and no material harm to the living conditions of nearby residents.

Assessment

Car Parking

- 7.93. The Proposed Development includes 50 car parking spaces at a ratio of 0.46 per dwelling in full accordance with the maximum standards set out under London Plan Policy 6.1 and Local Plan Policy LP 45.
- 7.94. A total of 11 spaces located within the undercroft will have active electric vehicle charging facilities which is 22% of the total car parking provision. The remaining 39 spaces will have passive provision. This is in full accordance with the electric vehicle charging requirements set out under London Plan Policy 6.1.
- 7.95. 11 of the proposed car parking spaces are design to be wheelchair accessible spaces. 7 are located within the undercroft and 4 at grade. This represents a provision of an accessible parking bay for 10% of units. This exceeds the requirements of London Plan Policy 6.1 which only requires 3% to be delivered and a demonstration of how a further 7% would be accommodated if necessary.

Cycle Parking

- 7.96. The standards set out under London Plan Policy and Local Plan Policy LP 45 require a total of 195 long-stay cycle parking spaces to be provided and 3 short-stay. The proposals provide a total of 197 long-stay and 8 short-stay cycle parking spaces in excess of these standards.
- 7.97. Cycle storage is provided at ground level within Block C and within the undercroft for Blocks A and B. Of these cycle parking spaces, 8 are proposed as larger spaces for cargo bikes and adapted cycles the 8 short-stay spaces (4 Sheffield style stands) provided externally within the landscape for visitors.
- 7.98. This ensures that cycle parking is convenient, and a range of cycle parking options are provided for future residents of the development to encourage sustainable modes of transport in accordance with the Healthy Streets approach set out under London Plan Policy T1 and with aims Local Plan Policy LP 30.

Servicing, Waste and Deliveries

- 7.99. In accordance with the requirements of London Plan Policy T4 and Local Plan Policy LP 45, a Draft Construction Management/Logistics Plan and a Transport Assessment, including Travel Plan Statements and Delivery Servicing Plan, has been prepared by Motion and submitted a part of this application.
- 7.100. These documents assess the impacts of the proposed development on the highway network, proposes appropriate mitigation and details the delivery strategy.

- 7.101. Deliveries and servicing will be undertaken from South Worple Way, utilising the new stretch of double yellow line loading opportunity to be introduced where the access has been closed. Swept path analysis is set out in the Delivery and Servicing Plan, demonstrating that expected delivery and servicing vehicles can manoeuvre into the loading opportunity and can stop to undertake deliveries and servicing without affecting the free flow of vehicle movements on South Worple Way.
- 7.102. The proposed development includes a concierge, located within a building adjacent to the central entrance to the site and a short distance from the delivery loading opportunity on South Worple Way. The concierge will receive deliveries on behalf of residents and the short distance between the loading opportunity and the concierge will limit the time that servicing and delivery vehicles will need to be stop on South Worple Way.
- 7.103. With regard to refuse collection, there is a store located in the north western corner of the site adjacent to the access road. Building management would be responsible for the transfer of waste bins from individuals stores within blocks to the main bin store in advance of the time of collection and returning the bins to stores after collection. The refuse vehicle will reverse from South Worple Way into the site and stop on the site access road to collect waste from the refuse store, before leaving the site in forward gear.
- 7.104. Delivery and servicing trips to the proposed development will be relatively infrequent, with deliveries typically comprising of supermarket home delivery vehicles and other on-line retail deliveries. The Proposed Development is expected to generate 14 deliveries per day, predominantly through transit type vans or small rigid lorries. Some of the delivery and servicing trips associated with the proposed development, such as post deliveries and refuse collection, will be linked to existing servicing and delivery trips already being undertaken on the street and in the local area, and therefore will not be new or additional servicing trips to the local highway network.

8. Environmental Considerations

8.1. This section sets out the environmental and technical considerations for the development proposals and assesses them against policy and relevant guidance. The following are considered in turn:

- i. Daylight, Sunlight & Overshadowing
- ii. Noise
- iii. Air Quality
- iv. Overheating
- v. Energy and Sustainability
- vi. Biodiversity
- vii. Flood Risk and Drainage
- viii. Arboriculture
- ix. Archaeology

(i) Daylight, Sunlight & Overshadowing

8.2. London Plan Policy D6 requires that development achieves acceptable levels of daylight, sunlight, overlooking and privacy levels for future residents of the development and for neighbouring buildings and users.

8.3. Local Plan Policy LP 8 'Amenity and Living Conditions' requires all development to protect the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties. This will include ensuring good standards of daylight sunlight are achieved, that balconies will not raise overlooking or noise disturbance issues and that proposals are not visually intrusive or overbearing.

Assessment

8.4. Daylight Sunlight Assessments have been prepared by XCO2, assessing the proposed development and the impact on neighbouring properties.

8.5. In regard to the proposed development, the Assessment finds that the proposed scheme will achieve good levels of daylight to all dwellings and habitable spaces. Only 16 rooms were found to fall short of the BRE criteria, 14 of which are because of the windows being located under balconies that are

serving the dwellings above. The other two rooms are a bedroom and a living/dining room on the top floor of Block C, which fall very slightly short of their ADF targets (with ADFs of 0.99% and 1.48%, respectively).

- 8.6. For the sunlight assessment, 38 no. dwellings considered to be the worst-case units in terms of sunlight access across the scheme were selected. Of these, 34 living spaces will achieve adequate annual and winter sunlight based on the BRE Guide. The remaining 2 rooms falling short of the target achieve a percentage slightly below the recommended criteria, however, these have only one of their windows facing due south and they are not considered main windows. Overall the sunlight levels for the proposed development are considered to be acceptable.
- 8.7. In regard to the daylight sunlight impact on neighbouring properties, the Assessment found that the development is not considered to have any notable impact on the daylight or sunlight levels received by neighbouring properties.

(ii) Noise

- 8.8. London Plan Policy D13 'Agent of Change' places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. Development should be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them.
- 8.9. London Plan Policy D14 'Noise' states that development proposals should seek to manage noise through the following measures:

"1) avoiding significant adverse noise impacts on health and quality of life

2) reflecting the Agent of Change principle as set out in Policy D13 Agent of Change

3) 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 existing noise-generating uses

4) improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity)

5) separating new noise-sensitive development from major noise sources (such as road, rail, air transport and some types of industrial use) through the use of distance, screening, layout, orientation, uses and materials – in preference to sole reliance on sound insulation

6) 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) promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver."

8.10. At the local level, Policy LP 8 requires that developments do not harm the reasonable enjoyment of the use of buildings, gardens and other spaces due to increases in noise disturbance.

8.11. Local Plan Policy LP 10 'Local Environmental Impacts, Pollution and Land Contamination' states that the Council encourages good acoustic design to ensure occupiers of new and existing noise sensitive buildings are protected. The following will be required, where necessary:

"1. a noise assessment of any new plant and equipment and its impact upon both receptors and the general background noise levels;

2. mitigation measures where noise needs to be controlled and managed;

3. time limits and restrictions for activities where noise cannot be sufficiently mitigated;

4. promotion of good acoustic design and use of new technologies;

5. measures to protect the occupiers of new developments from existing sources."

Assessment

8.12. A detailed Noise Impact Assessment has been prepared by Paragon Acoustic Consultants and submitted as part of this application.

8.13. Regarding noise impact, the Assessment finds that subject to appropriate mitigation such as housing the ASHP units in purpose-built enclosures, the proposed development would comfortably be in compliance with the atmosphere criteria set out in the report: rating level of 30 dB LAr, Tr dB.

8.14. Regarding ground borne vibration, the Assessment demonstrates "low probability of adverse comment" for the day and night periods, according to the guidance given in BS 6472:2008. Whilst certain individual events maybe perceptible, the standard advises that adverse comment would not be expected, for vibration exposure of the magnitude reported.

(iii) Air Quality

- 8.15. The NPPF states that development should not contribute to or be put at unacceptable risk of, or be adversely affected by unacceptable levels of pollution, including air pollution (paragraph 174).
- 8.16. Paragraph 186 of the NPPF advises that planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.
- 8.17. London Plan Policy SI 1 'Improving Air Quality' requires developments to meet Air Quality Neutral. development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality in preference to post-design or retro-fitted mitigation measures. Major development proposals must be submitted with an Air Quality Assessment that demonstrates how the proposals will not lead to a deterioration in air quality or create unacceptable risk of high levels of exposure to poor air quality.
- 8.18. Local Plan Policy LP 8 requires that developments do not harm the reasonable enjoyment of the use of buildings, gardens and other spaces due to increases in air pollution.
- 8.19. Local Plan Policy LP 10 requires developments to achieve at least 'Emissions Neutral'. Air Quality Assessments are required to assess the impact of development proposals and where necessary propose mitigation measures.

Assessment

- 8.20. An Air Quality Assessment and Air Quality Neutral Assessment have been prepared by RPS and submitted as part of this application.
- 8.21. The Air Quality Assessment considers the air quality impacts from the construction phase and once the Proposed Development is fully operational. The Assessment concludes that the proposals do not, in air quality terms, conflict with national or local policies, or with measures set out in LBRuT's Air Quality Action Plan and that there are no constraints to the development in the context of air quality.
- 8.22. Subject to implementing the mitigation measures proposed within the Assessment in line with the Mayor of London's Control of Dust and Emissions during Construction and Demolition Supplementary

Planning Guidance during the construction phase of development, the risk of dust impacts is considered to be acceptable. Regarding the operational impact of the Barnes Hospital development on the surrounding area, the development generates a small number of additional vehicle movements and, with reference to the relevant threshold criteria, the air quality effects are not considered significant.

- 8.23. Detailed atmospheric dispersion modelling has been undertaken to establish the suitability of the site for its proposed use. Pollutant concentrations at the façades of proposed residential receptors are predicted to be well within the relevant health-based air quality objectives. On that basis, future users of the development should be exposed to acceptable air quality and the site is deemed suitable for its proposed future use in this respect.
- 8.24. The Air Quality Neutral Assessment concludes that the development is considered to be Air Quality Neutral once the mitigation measures included in the design and the decrease in traffic flows compared to the existing use are taken into account. The design mitigation measures include cycle parking facilities above the London Plan requirements, 22% electric vehicle charging provision, provision of green roof coverings, and filters in the ventilation system.

(iv) Overheating

- 8.25. Local Plan Policy LP 20 'Climate Change Adaption' states that *"New development, in their layout, design, construction, materials, landscaping and operation, should minimise the effects of overheating as well as minimise energy consumption in accordance with the following cooling hierarchy:*

- 1. minimise internal heat generation through energy efficient design*
- 2. reduce the amount of heat entering a building in summer through shading, reducing solar reflectance, fenestration, insulation and green roofs and walls*
- 3. manage the heat within the building through exposed internal thermal mass and high ceilings*
- 4. passive ventilation*
- 5. mechanical ventilation*
- 6. active cooling systems (ensuring they are the lowest carbon options)."*

Assessment

- 8.26. A TM:59 Overheating Analysis has been prepared by Flatt Consulting and submitted as part of this application. Block B was selected for the Assessment as the most exposed and a good representation for all apartments.
- 8.27. The Analysis concludes that all rooms pass under the TM:59 criteria with no fails for either bedrooms or living / dining / kitchen areas. Additional results have been presented within the report where the proposed development has been tested against potential future weather scenarios driven by climate change (DSY2 and DSY3). These are required to be reported as part of the analysis, however, are not necessary for assessing the acceptability of the proposals against the TM:59 criteria.
- 8.28. Considering that all of the rooms pass under the TM:59 Analysis, the proposals are considered to have minimised the effects of overheating and energy consumption (as set out below), in accordance with the aims of Local Plan Policy LP 20.

(v) Energy and Sustainability

- 8.29. London Plan Policy SI 2 'Minimising greenhouse gas emissions' requires that major development proposals should be net zero-carbon, minimising CO2 emissions in accordance with the energy hierarchy:
- i) Be lean: use less energy;
 - ii) Be clean: supply energy efficiently;
 - iii) Be green: use renewable energy;
 - iv) Be seen: monitor, verify and report on energy performance.
- 8.30. Major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy. A minimum on-site reduction of at least 35 per cent beyond Building Regulations 152 is required for major development. Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures. Major development proposals should calculate and minimise carbon emissions from any other part of the development, including plant or equipment, that are not covered by Building Regulations, i.e. unregulated emissions.
- 8.31. Local Plan Policy LP 22 'Sustainable Design and Construction' requires all planning applications for 1 dwelling or more to include a completed Sustainable Construction Checklist. Further, all residential development that results in a new dwelling will be required to incorporate water conservation

measures to achieve maximum water consumption of 110 litres per person per day for homes (including an allowance of 5 litres or less per person per day for external water consumption).

- 8.32. The policy further requires all major residential developments to achieve zero carbon standards in line with London Plan Policy and follow the Mayor's Energy Hierarchy. Meanwhile, all new development will be required to connect to existing DE networks where feasible. This also applies where a DE network is planned and expected to be operational within 5 years of the development being completed. Development proposals of 50 units or more, or new non-residential development of 1000sqm or more, will need to provide an assessment of the provision of on-site decentralised energy (DE) networks and combined heat and power (CHP).

Assessment

- 8.33. An Energy Assessment has been prepared by Flatt Consulting and submitted as part of this planning application.
- 8.34. The Assessment follows the energy hierarchy in accordance with London Plan Policy SI 2. Overall, a reduction in regulated carbon emissions of 36% over Building Regulations Part L 2013 is achieved when using the SAP2012 calculations and a 67% reduction when using the SAP10 calculations.
- 8.35. Under the SAP2012 calculations, there is an 11% reduction in regulated emissions compared to Building Regulations Part L1A 2013 on energy efficiency measures alone (Be Lean) and 14% against the SAP10 figures.
- 8.36. The development is proposed to meet the zero-carbon requirement through the remaining 64% of regulated carbon emissions being offset via a carbon offset payment in lieu. This has been calculated as £39,830, based on the £95 per tonne of carbon emissions rate set by the GLA and adopted by LBRUT.

(vi) Biodiversity

- 8.37. The NPPF (2021) paragraph 180 states that any planning proposals for which significant negative impacts on biodiversity cannot be avoided, mitigated or compensated for should be refused. Furthermore, paragraph 174 states that planning policies and decisions should contribute to and enhance the local environment.
- 8.38. London Plan Policy G6 'Biodiversity and access to nature' states that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.

- 8.39. London Plan Policy G8 'Food Growing' states that where possible, development should encourage community gardening and food growing within their proposals.
- 8.40. Local Plan Policy LP 15 'Biodiversity' states that the Council will seek to protect and enhance biodiversity and that major developments are required to deliver biodiversity net gain through ecological enhancements. The following measures will be encouraged and supported: the provision of new habitats including trees, the enhancement of wildlife corridors for the movement of species, maximising the provision of soft landscaping and other vegetation.

Assessment

- 8.41. A full Ecological Appraisal has been prepared by Aspect Ecology and submitted as part of this application. Surveys were undertaken in June 2021 to provide an update on previous surveys undertaken in July 2018 and August 2019.
- 8.42. The surveys have consistently found no evidence of roosting bats on-site and that specific mitigation or licensing for bats is not required. Regardless, precautionary mitigation measures are proposed within the Appraisal which finds that subject to implementation, bats will be fully safeguarded under the proposals. The Appraisal also found that the proposals for the site are unlikely to have a significant effect on foraging and commuting bats.
- 8.43. The survey results for badgers are considered sensitive. The results and evaluation in respect of this species at the site are set out in a separate Confidential Appendix.
- 8.44. Regarding other mammals, the survey found:

"No evidence of any other protected, rare or notable mammal species was recorded within the site. During the camera trapping surveys multiple records of Fox Vulpes were noted during surveys, however this species remains common in both a local and national context, and as mentioned above do not receive specific legislative protection in a development context. As such, these species are not a material planning consideration and the loss of potential opportunities for these species to the proposals is of low significance.

The desktop study returned background records of Hedgehog within the surrounding area. Hedgehog is a Priority Species, albeit this species remains common and widespread in England. The site offers potential opportunities for this species, particularly in the form of areas at the site boundaries which support scrub, grassland, outgrown ornamental planting, trees and tall ruderal vegetation. In any event, abundant similar opportunities are present within the local area and there is no evidence to suggest the proposals will significantly affect local populations of this species. However, it is

recommended that precautionary safeguards are put in place to minimise the risk of harm to Hedgehog in the event this species is present, as detailed in section 6 below."

- 8.45. The lack of suitable habitats on the existing and proposed site and in the surrounding area means that it is considered unlikely the proposals would result in any significant harm to any protected, rare or notable amphibians, reptiles and invertebrates.
- 8.46. Section 6 of the Appraisal sets out some mitigation and ecological enhancement measures, benefiting species such as bats and birds. These include bird and bat boxes, and it is noted the proposed community orchard area within the centre of the development will make a positive contribution to local community food growing in accordance with London Plan Policy G8 as well as providing a nectar source for bees and other pollinating insects.
- 8.47. The proposals will result in the removal of approximately 1,000sqm of hardstanding and replaced with high quality landscaping and planting which will improve the greening and is expected to result in biodiversity net gain. Considering this, the proposals are in accordance with the NPPF, London Plan Policy G6 and Local Plan Policy LP 15.

(vii) Flood Risk and Drainage

- 8.48. The NPPF (2021) requires that developments be supported by a flood risk assessment where appropriate and that applications should only be permitted in areas at risk of flooding where the development locates the most vulnerable uses in the lowest areas of flood risk, is appropriately flood resilient and resistant and safe access and escape routes are included.
- 8.49. London Plan Policy SI 12 'Flood risk management' states that development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. Natural flood management methods should be employed in development proposals due to their multiple benefits including increasing flood storage and creating recreational areas and habitat.
- 8.50. London Plan Policy SI 13 'Sustainable Drainage' states that development proposals *"should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features, in line with the following drainage hierarchy:*

1) rainwater use as a resource (for example rainwater harvesting, blue roofs for irrigation)

2) rainwater infiltration to ground at or close to source

3) rainwater attenuation in green infrastructure features for gradual release (for example green roofs, rain gardens)

4) rainwater discharge direct to a watercourse (unless not appropriate)

5) controlled rainwater discharge to a surface water sewer or drain

6) controlled rainwater discharge to a combined sewer.”

- 8.51. Local Plan Policy LP 21 'Flood Risk and Sustainable Drainage' requires that all developments should avoid, or minimise, contributing to all sources of flooding, including fluvial, tidal, surface water, groundwater and flooding from sewers, taking account of climate change and without increasing flood risk elsewhere. Development will be guided to areas of lower risk by applying the 'Sequential Test' as set out in national policy guidance. All major developments are required to provide a Drainage Statement.
- 8.52. The policy further requires the use of Sustainable Drainage Systems (SuDS) in all development proposals and where feasible, achieve a reduction in surface water discharge to greenfield run-off rates.

Assessment

- 8.53. A Flood Risk Assessment ('FRA') has been prepared by Robert Bird Group and submitted as part of this application in accordance with the NPPF.
- 8.54. The Assessment had regard to the LBRUT Strategic Flood Risk Assessment (SFRA) and concludes that the risk of flooding to the site from tidal and fluvial, surface water, groundwater, sewers, and artificial sources is low.
- 8.55. The proposals will result in a significant improvement in drainage and thereby result in a reduced risk of flooding over the existing site in accordance with London Plan SI 12 and Local Plan Policy LP 21. The surface water network discharges to the 225 mm Thames Water existing sewer in South Worple Way, connecting at an invert level of 4.600 with a flow rate of 5 l/s. To the northwest of the site, a 0.9 x 11 x 20 m attenuation tank crate system is proposed. A hydrobrake control chamber will limit the flow to 5 l/s for the 1 in 30 year storm event. The LBRT 2021 SFRA states that planning applications should utilise the 'upper end' climate change scenarios when implementing the climate change allowances for surface water and so the calculations have allowed for a 40% increase due to climate change.

- 8.56. The flow rate of 5l/s has previously been agreed with the LLFA under the OPP for this site and confirmation has been received that the flow rate of 5l/s is acceptable subject to demonstrating the flows from the 100-year storm events are managed. The existing flow rate for the site during a 1/30 year storm is 113l/s so the proposals offer a 96% betterment on the existing drainage capacity.
- 8.57. The FRA also includes a SUDS Statement and pro-forma in accordance with Local Plan Policy LP 21. A green roof will be used to provide a level of source treatment and increases the surface waters time of entry into the public drainage network. A total area of 1420 m² has been modelled, using 100mm depth, which corresponds to 50% of the total roof area across the three buildings. As the design develops, if further area at roof level becomes available it will be utilised as green roof. To the east of the site, 250 m² of permeable paving will be used on external pavement areas. It has been designed with 0.35 m depth of substrate. This will provide shallow storage and water quality treatment at the source of capture.
- 8.58. The proposals are therefore considered in accordance with the NPPF, London Plan Policies SI 12 and SI 13 and Local Plan Policy LP 21.

(viii) Landscaping, Arboriculture and Urban Greening

- 8.59. London Plan Policy G5 'Urban Greening' requires major development to include urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. The Mayor recommends an Urban Green Factor (UGF) target score of 0.4 for developments that are predominantly residential.
- 8.60. London Plan Policy G7 'Trees and woodlands' states that development proposals should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT or another appropriate valuation system. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.
- 8.61. Local Plan Policy LP 10 states that development must not lead to unacceptable impacts due to artificial lighting and appropriate mitigation measures should be incorporated where necessary.
- 8.62. Local Plan Policy LP 12 'Green Infrastructure' requires that development proposals protect and where opportunities arise enhance local green infrastructure. The policy sets out LBRUT's open space

hierarchy with areas of less than 2 hectares defined as small local parks and open spaces that are suitable for *“Gardens, sitting out areas, children’s play spaces or other areas of a specialist nature, including nature conservation areas as well as visual amenity.”*

- 8.63. Local Plan Policy LP 16 ‘Trees, Woodlands and Landscape’ requires the protection of existing trees and the provision of new trees, shrubs and other vegetation of landscape significance that complement existing, or create new, high quality green areas, which deliver amenity and biodiversity benefits. Development proposals should resist the loss of trees including those that are aged and or provide townscape of amenity value, replace where practicable any tree that is felled with an appropriate replacement and ensure that trees are adequately protected throughout the course of development, in accordance with British Standard 5837.
- 8.64. Local Plan Policy LP 17 ‘Green roofs and walls’ requires green and or brown roofs be incorporated into new major developments with roof plate areas of 100sqm or more where technically feasible and subject to considerations of visual impact. The aim should be to use at least 70% of any potential roof plate area as a green / brown roof. The onus is on an applicant to provide evidence and justification if a green roof cannot be incorporated. The Council will expect a green wall to be incorporated, where appropriate, if it has been demonstrated that a green / brown roof is not feasible.
- 8.65. Local Plan Policy LP 32 ‘Allotments and food growing spaces’ supports the provision of spaces that could be used for community gardening.

Assessment

- 8.66. The proposals include an exceptionally high quality suite of landscaping, planting and urban greening proposals. Wherever possible, existing trees have been retained, complying with London Plan Policy G7 and Local Plan Policy LP 16. Of a total of 28 existing trees on-site, a total of 22 are retained and a further 64 trees are proposed as part of the landscaping strategy.
- 8.67. The proposals also provide significant soft landscaping and lower level planting, including food growing spaces within the Orchard Garden and Grow Garden in accordance with Local Plan Policy LP32. While a detailed lighting strategy will be formalised later in the design process, the high-level lighting strategy will ensure that the lighting is designed to be of a natural warm tone, which is soft and balanced to appropriate low and functional levels. The proposed fittings are to be robust, elegant and well made to provide an excellent service life while also positioned to avoid stray light or sky spill in accordance with Local Plan Policy LP 10.
- 8.68. Green roofs are proposed for all three blocks and are expected to cover more than 70% of the roof form in accordance with Local Plan Policy LP 17. The exact extent and area of the green roofs will be

confirmed at the detailed design stage. Blocks B and C will have extensive green roof provision over the majority of the roof spaces while the northern half of Block A will be green roof with the southern half consisting of the plant enclosure.

- 8.69. The proposed development will therefore deliver significant levels of urban greening, achieving a UGF score of 0.49, well above the requirements of London Plan G5.
- 8.70. The proposals are therefore in accordance with London Plan Policies G5 and G7 and Local Plan Policies LP 10, LP 12, LP 16, LP 17 and LP 32.

(ix) Archaeology

- 8.71. London Plan HC1 state that new developments should make provision for the protection of archaeological resources and landscapes to avoid harm through design and appropriate mitigation.
- 8.72. Local Plan Policy LP 7 'Archaeology' states that the *"Council will seek to protect, enhance and promote its archaeological heritage (both above and below ground), and will encourage its interpretation and presentation to the public. It will take the necessary measures required to safeguard the archaeological remains found, and refuse planning permission where proposals would adversely affect archaeological remains or their setting.*

Desk based assessments and, where necessary, archaeological field evaluation will be required before development proposals are determined, where development is proposed on sites of archaeological significance or potential significance."

Assessment

- 8.73. A desk-based Archaeology Assessment has been prepared by AOC Archaeology Group and submitted as part of this application in accordance with Local Plan Policy LP 7.
- 8.74. The Assessment concludes that *"there is little evidence for activity pre-dating the medieval period within the vicinity of The Site. Whether this is due to a lack of intrusive investigations in the area producing evidence, or a true reflection of the potential of the area, is unknown. However, based on current evidence, potential for archaeological remains dating up to the medieval period to survive on The Site is considered Low. The potential for archaeological remains dating from the medieval to post-medieval periods to survive is considered be Low. The potential for archaeological remains relating to the modern period, particularly the historical development of The Site as Barnes Hospital from 1888 is Medium to High."*
- 8.75. In terms of mitigation, it is considered that a watching brief would only be required on the grubbing up of the foundations to establish the potential for archaeological remains within the Site. Dependent

upon the results of the watching brief further mitigation, such as targeted trial trenching could be required to further investigate potential remains.

9. Heads of Terms and Community Infrastructure Levy

9.1. 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

9.2. Planning obligations will be secured to mitigate impacts arising from the scheme. Whilst the final S106 Heads of Terms will be subject to ongoing discussions with LBRuT, these are expected to include the following:

- Delivery of Affordable Housing;
- Local Employment Agreement;
- CPZ Contributions;
- Playspace Contribution;
- Carbon Offsetting Payment;
- Travel obligations, including travel plans; and
- Monitoring.

Community Infrastructure Levy

9.3. The Proposed Development will contribute to the Mayor's and LBRuT's delivery of infrastructure through the payment of the Community Infrastructure Levy. This will be paid in accordance with the Mayoral Charging Schedule 2 (MCIL2) (2019) and the LBRUT Charging Schedule (2014) (or any relevant charging schedule that may replace these prior to determination of the application).

9.4. The affordable housing will benefit from social housing relief which will be applied to the final CIL payments. The following CIL rates are applicable in this location:

- **MCIL 2:** All uses - £80 per sqm
- **LBRUT CIL:** Residential (C3 Use Class) - £250 per sqm

10. Conclusion

- 10.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires proposals to be determined in accordance with the Development Plan unless other material considerations indicate otherwise.
- 10.2. This Planning Statement has assessed the development against the Development Plan and other national, regional and local planning policy.
- 10.3. The principle of the Proposed Development accords with the adopted London Plan (2021) and Local Plan (2018) which seek to optimise the use of brownfield sites to deliver the highest possible levels of residential accommodation subject to local context and residential quality. As demonstrated through this Statement, the proposals successfully achieve this in this location.
- 10.4. The submitted planning application seeks the following:
- “Demolition of existing structures and redevelopment of site including construction of three new buildings comprising residential units of mixed tenure (Use Class C3), conversion of two existing buildings for residential use (Use Class C3), car and cycle parking, landscaping and associated works.”*
- 10.5. The Proposed Development provides an opportunity to deliver an increased provision of both affordable and market residential accommodation over and above the OPP. This includes the provision of 22% affordable housing with a tenure split of 79% affordable rent and 21% intermediate accommodation.
- 10.6. The proposals will deliver significant public realm and urban greening benefits as well as enhancing ecology and biodiversity on the site.
- 10.7. The Proposed Development would deliver an exemplary development which would have many regenerative and economic benefits for the site in line with the NPPF, London Plan and the Council's planning objectives.
- 10.8. It is considered that the proposed development is in accordance with planning policies at national, regional and local levels. Accordingly, we respectfully request the Proposed Development be approved without delay.

Appendix I
OPP Committee Report

Contact Details

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