



47A, 47 AND 49 LOWER MORTLAKE ROAD, RICHMOND, TW9 2LW

Planning Statement

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**CONTENTS**

1. INTRODUCTION .....3  
2. THE SITE, SURROUNDING AREA AND PLANNING HISTORY .....6  
3. PRE-APPLICATION DISCUSSIONS AND CONSULTATION.....10  
4. PLANNING POLICY CONTEXT .....11  
5. PLANNING ASSESSMENT .....19  
6. SUMMARY & CONCLUSIONS .....28

**Appendix 1 – Marketing Summary Report**

## 1. INTRODUCTION

- 1.1 This Statement has been prepared by DP9 Ltd (“DP9”) on behalf of Westlake Property Limited (“the Applicant”) in support of a planning application for the redevelopment of 47a, 47 and 49 Lower Mortlake Road, Richmond, TW9 2LW (“the Site”) to provide a part 1/2/3 storey building (plus lower ground) to provide 14 co-living units (sui generis) and associated internal amenity space at lower ground floor level, with new lower ground level amenity space to neighbouring buildings, and alongside external communal space at ground and lower ground level (“the Proposed Development”).
- 1.2 This Planning Statement has been prepared in order to provide an overview of all aspects of the Proposed Development and an assessment of its appropriateness against the Development Plan and other material considerations.

### The Proposed Development

- 1.3 The application seeks planning permission for the Proposed Development, which includes the redevelopment of an unused yard and construction of a new co-living development with internal amenity areas and communal external amenity space. Further detail is provided in the plans and drawings forming this planning application and the supporting Design and Access Statement (“DAS”), prepared by Boehm Lynas Architects (“Boehm Lynas”).
- 1.4 The application positively responds to the comments received in relation to a previous application on part of the Site, which was the subject of a refusal by London Borough of Richmond upon Thames (“LBRuT”) and a subsequent dismissal following an appeal. This is picked up in detail throughout this Planning Statement with ‘IR’ references relating to the paragraph number in the Inspector’s Report dated 22 July 2021.
- 1.5 The Proposed Development, through the provision of a new, modern co-living building alongside extensive new internal and shared external amenity for the adjacent HMO properties, represents a clear opportunity to deliver the following economic, social and environmental benefits:
- Demonstrable sustainable development in line with the NPPF and London Plan, facilitating the delivery of housing<sup>1</sup> to meet required local needs.
  - Provision of a sustainable and high-quality building and associated works<sup>2</sup>, representing a sympathetic and appropriate response to the character of the adjacent Conservation Area.

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<sup>1</sup> Recognising the Inspector’s agreement that the co-living use “would result in benefits in terms of providing additional residential accommodation” (IR paragraph 25) and that as a co-living housing use it is “akin to a largescale HMO” (IR paragraph 7).

<sup>2</sup> A marked improvement to the previous scheme, in terms of carbon reduction.

- Provision of co-living accommodation with modern, high-specification space suitable to meet demonstrable local needs.
- Introduction of extensive new internal amenity space<sup>3</sup> to enhance the neighbouring existing HMO properties, shared between HMO tenants in each of these separate buildings, alongside attractive split level communal gardens between the three properties of 47a, 47 and 49 Lower Mortlake Road.
- Building upon the accessible location with an existing excellent level of public transport<sup>4</sup> and pedestrian and cycle accessibility and introducing design measures including site layout, design and management to encourage enhanced pedestrian and cyclist accessibility.
- Incorporation of sustainable technologies and building improvements to achieve energy efficiency and carbon reduction targets.
- Transformation of a currently vacant and underutilised infill site<sup>5</sup>, which currently detracts from the quality of this section of Lower Mortlake Road frontage and Blue Anchor Alley, to provide an appropriate use and representing a 'good neighbour' in terms of amenity effects.
- Generate Community Infrastructure Levy payments for local benefit.

### The Planning Application

- 1.6 The planning application has been submitted in full to LBRuT and seeks planning permission for the following development:

*"Construction of a part 1/2/3 storey building (plus lower ground) to provide 14 co-living units (sui generis) and associated internal amenity space at lower ground floor level, with new lower ground level amenity space to neighbouring buildings, and alongside external communal space at ground and lower ground level."*

- 1.7 The planning application comprises the following:

- Application Form and Ownership Certificates, prepared by DP9;
- CIL Additional Information Form, prepared by DP9;
- Planning Statement, prepared by DP9;
- Existing and Proposed Plans and Drawings, prepared by Boehm Lynas;
- Design and Access Statement ("DAS"), prepared by Boehm Lynas;
- Transport Statement (including Travel Plan), prepared by Transport Planning Practice ("TPP");
- Construction Management Statement, prepared by TPP;
- Heritage Impact Assessment, prepared by HCUK;

<sup>3</sup> Responding to the Inspector's consideration of harm caused to these buildings in terms of reduced external amenity (IR paragraph 16) the Proposed Development provides new communal gardens plus considerable internal amenity space.

<sup>4</sup> Noting the Inspector's acceptance that the Site is "in a sustainable location" (IR paragraph 25).

<sup>5</sup> Presented as one of the previous scheme's benefits by the Inspector (IR paragraph 25).

- Fire Statement, prepared by CHPK;
- Surface and Foul Water Drainage Strategy (including Flood Risk Assessment), prepared by Constructure;
- Structural Report (including Basement Impact Assessment), prepared by Constructure;
- Affordable Housing Statement & Economic Appraisal Viability Report), prepared by ULL;
- Utilities information;
- Energy and Sustainability Statement, prepared by JAW;
- Acoustic Report, prepared by Auricl;
- Daylight and Sunlight Assessment, prepared by TFT; and
- Health Impact Assessment, prepared by DP9.

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

- Section 2 describes the Site, the main features of the surrounding area and the Site's planning history.
- Section 3 describes the Pre-Application discussions between the Applicant and the Council.
- Section 4 outlines the relevant planning policy context of the Site.
- Section 5 sets out a planning assessment of the Proposed Development against policy requirements.
- Section 6 provides a summary and our conclusions on the Proposed Development.

## 2. THE SITE, SURROUNDING AREA AND PLANNING HISTORY

- 2.1 The Site extends to approximately 610 sqm (0.061 ha) and comprises 47a in its entirety and parts of 47 and 49 Lower Mortlake Road, Richmond, TW9 2LW. The extent of the red line planning application boundary is defined in the Site Location Plan, prepared by Boehm Lynas, submitted with this planning application. Further information is provided in the DAS.
- 2.2 The Site comprises a vacant former yard (previously used as a temporary car wash and Christmas tree sales yard) which is currently an unused area of hard standing, surrounded by a high brick wall, with the main access directly from the front, and parts of 47 and 49 Lower Mortlake Road (namely land under these properties which is to become the new lower ground amenity space, and parts of the ground floors that will be reconfigured to allow for access to this lower ground level) . The Site is located on the western end of Lower Mortlake Road, approximately 400m to the north-east of Richmond underground station and 650m to the west of North Sheen train station.
- 2.3 The wider area is characterised by residential uses, with a range of styles and sizes of properties along Lower Mortlake Road. Directly to the north and west of the Site lies the Kew Foot Road Conservation Area, characterized in the immediate vicinity of the Site by two/three storey brick terraced houses with neat rooflines. There is one Grade II listed building to the north of the Site consisting of a three-storey bakery with an Art Deco façade.
- 2.4 While the area is predominantly residential, a number of larger structures used as hotels, showrooms and shops lie on the southern side of Lower Mortlake Road. As the street continues westward toward Richmond town centre, it loses its residential character and becomes dominated by retail, food and beverage and service uses.
- 2.5 To the west of the Site lies Old Deer Park, as well as a number of outdoor leisure facilities including sports pitches, a golf course and an open-air swimming pool.
- 2.6 Further detail of the Site, these adjacent properties and the wider area is included in the DAS and in the supporting plans and drawings submitted as part of this planning application.
- 2.7 The Site is accessible by public transport with the nearest bus stop less than 50m to the east on Lower Mortlake Road. These stops primarily support local services in Richmond and the south east. The Site is also served by train (South-West Rail) at both Richmond Station and North Sheen Station, both of which are within walking distance of the site. In addition, the Site is served by Overground and District line underground services at Richmond Station. Reflecting these links, the Site has a Public Transport Accessibility Level (PTAL) of 6a (with 6b being the highest). As set out previously, the Inspector who decided the appeal of the previous scheme was clear that the Site is a “sustainable location” (IR paragraph 25),

considered by her to be one of the benefits of that scheme and which would therefore apply to this application too.

### Site Planning History

- 2.8 A number of historic planning applications have been made at the Site, however, most have either been withdrawn or refused. In 2002, consent was granted for the development of a three storey building to provide Class B1 Offices (ref: 01/2289), however these plans were subsequently abandoned on the basis that this use was considered to be unviable. This is a relevant point to note as part of this planning application and is discussed later in this Planning Statement.
- 2.9 Historically the Site has been used as a car wash, a car park, and as a yard to sell Christmas trees. Consent was not sought for these uses by previous owner.
- 2.10 In November 2019, the Applicant submitted an application for the construction of a part 2/3 storey building with lower ground-floor level to provide 16 co-living units and associated internal and external communal facilities, a sunken garden and bicycle parking spaces (ref: 19/3352/FUL). Planning Permission was refused by LBRuT on 26 June 2020.
- 2.11 The Applicant submitted an appeal to the Planning Inspectorate, which, as stated previously, was subsequently dismissed on 22 July 2021. The main issues highlighted by the Planning Inspectorate were the following:
- a) Harm the living conditions of the occupants of neighbouring properties in terms of overlooking and sense of enclosure.
  - b) Harm to neighbouring properties (47 and 49 Lower Mortlake Road) in terms of reduced outside private space.
  - c) No mechanism to affordable housing contributions should this be required (with LBRuT and the Applicant/Appellant agreeing that the scheme could not provide such contributions or provision).
  - d) Would not contribute sufficiently to reducing the causes and effects of climate change and no legal agreement to secure offset payments.
- 2.12 The Proposed Development directly responds to these reasons for refusal of the previous scheme, and this is covered further in this Planning Statement, with further detail and explanation within the DAS. For ease of reference, the response to each of these reasons is provided below:
- a) The massing of the 47a co-living building has been materially decreased to lower the height in parts and increase setbacks. This is best explained in the DAS and the resultant positive effects shown in the supporting daylight and sunlight report prepared by TFT.

- b) The Proposed Development is fundamentally different to the previous scheme in that it no longer removes access to external space for residents of the 47 and 49 Lower Mortlake Road residents, instead creating an accessible extensive shared garden across two levels. This must be read alongside the new internal amenity space to both units as well which represents a significant enhancement to the amenity spaces available to existing HMO residents.
- c) In principle this will be picked up in a future Section 106 agreement should LBRuT be minded to grant planning permission. It is worth noting that the viability position has been updated to reflect the new scheme (with the position on viability being no better) and the Applicant agrees to the necessary mechanism to secure this, and it is suggested that is discussed further with LBRuT officers as part of the determination of this application.
- d) The Proposed Development performs significantly better than the previous the scheme in terms of sustainability and operational carbon. This reflects the incorporation of ASHP technology within the scheme representing a 58% carbon saving (previously 26%). Further information is provided in the supporting material prepared by specialists, JAW Sustainability. The Proposed Development now exceeds policy requirements and therefore a financial offset should not be required and therefore would not need a Section 106 obligation to secure this. Again, the Applicant can pick this up with LBRuT officers as part of the determination of this application

2.13 Considering the Inspector's conclusions further, this outlines a series of principles which are highlighted here noting that they remain relevant to the Proposed Development and these are material in the consideration of this planning application:

- The co-living units do not *"function as self-contained accommodation"* with the development providing *"shared space for occupants with private rooms accessed from within the shared areas"* (IR paragraph 6). This continues to be the case with the Proposed Development, and the 47a part of the scheme.
- The co-living use proposed is *"akin to a largescale HMO"* whereby *"occupants ... would live together similar to a largescale purpose-built HMO in a co-living arrangement"* (IR paragraph 7). This continues to be the case for 47a as part of this current application.
- The Inspector concluded that *"the level of communal space, outside space along with the private space offers would provide occupants with a satisfactory level of accommodation"* (IR paragraph 9). The current application provides the same size private space (thus remaining satisfactory) and shared space, albeit because occupancy is lower, there is an increased level of shared amenity to occupants of 47a.
- In addition, the nature of accommodation proposed results in *"no harm to the living conditions of future occupants"* within the development (IR paragraph 10). This applies to the current application also.



- The provision of “*additional residential accommodation*” is seen as a benefit (IR paragraph 25). This continues to be the case, applying to the Proposed Development.
- The Site being in a “sustainable location” is a benefit (IR paragraph 25) which evidently is still applicable with the current planning application.
- The re-use of a vacant site is also a benefit (IR paragraph 25), something which remains relevant and applicable, and which is arguably an even weightier benefit considering strategic objectives to maximise the development potential of such sites in national (NPPF) and regional (London Plan) policies.

2.14 Recognising this important context we now turn to the consideration of the Proposed Development specifically.

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

- 3.1 Prior to the submission of this planning application, and following the July 2021 appeal decision, pre-application discussions have been held with LBRuT Planning officers to discuss the revised scheme, including a formal pre-application meeting on 12 November 2021.
- 3.2 As previously outlined, this revised scheme has addressed all of the comments made as part of the pre-application discussions, as well as addressing the reasons for refusal outlined in the decision notice dated 26 June 2020, and reasons for dismissal in the appeal decision dated 22 July 2021.
- 3.3 Further detail about the design evolution of the Proposed Development is set out in the DAS submitted in support of this application.

#### 4. PLANNING POLICY CONTEXT

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 ('the 2004 Act') requires that planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise. This statutory duty is emphasised at paragraph 2 of the NPPF (2021). The Development Plan for the Site comprises the London Plan (March 2021) ("the London Plan") and the LBRuT Local Plan (July 2018) ("the Local Plan").
- 4.2 LBRuT is currently preparing a new Local Plan, which will replace the current Local Plan (2018) and the Twickenham Area Action Plan. Informal engagement was held between the Council and local residents and stakeholders during the summer/autumn of 2021. The Council is aiming to publish their Draft Local Plan in the autumn of 2022, with the adoption of the new Local Plan scheduled for autumn 2024.
- 4.3 In light of this context, this section sets out the planning policy framework relevant to the Site and Proposed Development.

##### Planning Policy Overview

- 4.4 The NPPF was published in July 2021 (replacing previous versions) and sets out the Government's objectives for achieving sustainable development.
- 4.5 The NPPF establishes a presumption in favour of sustainable development. Paragraph 8 confirms there are three dimensions to sustainable development: economic, social and environmental. This includes "*ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations*" (paragraph 8).
- 4.6 When making planning decisions, paragraph 11 of the NPPF confirms that there should be a presumption in favour of sustainable development and that planning permission should be granted where development proposals accord with the development plan. This approach is applied in the assessment of the Proposed Development.
- 4.7 The NPPF then outlines a series of considerations against which development should be assessed. In terms of the Proposed Development the relevant considerations are:
- Chapter 5 – Delivering a sufficient supply of homes;
  - Chapter 8 – Promoting healthy and safe communities;
  - Chapter 9 – Promoting sustainable transport;
  - Chapter 11 – Making effective use of land;
  - Chapter 12 – Achieving well-designed places;

- Chapter 14 – Meeting the challenge of climate change, flooding and coastal change;
- Chapter 15 – Conserving and enhancing the natural environment; and
- Chapter 16 – Conserving and enhancing the historic environment.

- 4.8 NPPF paragraph 60 stresses that *“to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed”*. The Proposed Development responds positively to this requirement through the delivery of co-living units on this unused Site to meet demonstrable housing needs. Picking up earlier points, this is something that the Inspector explicitly cited as a benefit of the previous scheme and her comments would apply equally in the consideration of this application.
- 4.9 Paragraph 92 places importance on delivering healthy, inclusive and safe places including through the promotion of social interaction, safe and accessible spaces and encouraging walking and cycling. The Proposed Development is consistent with these goals.
- 4.10 NPPF paragraph 104 requires development proposals to consider transport issues from an early stage, so that impacts can be addressed, opportunities to encourage non-car means of travel adopted and that the design of schemes can be appropriately developed. The process of developing the scheme through early design concepts, pre-application engagement has ensured that such issues have been considered and addressed through inherent design features, and by making the scheme a car-free development.
- 4.11 Whilst referring to the development of planning policies, the NPPF is clear that local parking standards should take into account site accessibility; the type, mix and use of development; public transport access; and local car ownership levels (paragraph 107). The car parking strategy and interpretation of adopted standards reflects these important considerations.
- 4.12 Paragraph 111 is clear that *“development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe”*. The Proposed Development does not give rise to such impacts and as such is considered to be acceptable in terms of highways and related matters.
- 4.13 Paragraph 112 encourages proposals to be located and designed to achieve a number of specific objectives, including: the prioritisation of pedestrian and cycle movements; providing safe and secure layouts reducing conflict between transport users; and meeting the needs of people with disabilities. The Proposed Development will achieve these key practical targets.
- 4.14 A clear priority of the NPPF is to *“promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions”*

(paragraph 119). In response, the Proposed Development ensures that a vacant and thus underused Site is brought forward into active use, specifically to deliver new high quality co-living accommodation in an established residential location.

- 4.15 Paragraph 120 goes on to say that planning decisions should *“give substantial weight to the value of using suitable brownfield land within settlements for homes”*, and *“promote[ing] and support[ing] the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example ... car parks...)”*. The Proposed Development specifically addresses and supports this central policy requirement and again this is something that the Inspector commented on as a benefit previously.
- 4.16 Paragraph 125 states that *“it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site”*. Again, the Proposed Development directly responds to this through the delivery of an appropriate co-living scheme, and providing extensive new internal and enhanced external amenity space for all three properties within the Site.
- 4.17 The NPPF requires high quality design and good architecture, with paragraph 126 adding that *“the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve”*. Paragraph 130 sets out detailed points on how this should be achieved, and includes ensuring that development functions well; adds to the overall quality of the area; is visually attractive; is sympathetic to local character and history; maintains a strong sense of place; optimises the potential of the site; and creates safe, inclusive and accessible places. The Proposed Development is considered to achieve these requirements as they relate to design.
- 4.18 The NPPF sets an expectation that applicants *“work closely with those affected by their proposals to evolve designs [and that where this can be demonstrated] ... new development should be looked on more favourably than those that cannot”* (paragraph 132). Pre-application engagement with LBRuT has been undertaken to achieve a high-quality scheme with comments feeding into the final design.
- 4.19 NPPF paragraph 134 adds that, *“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”*. The Proposed Development is designed to replace a vacant and poorly kept site, detracting from the street scene, with a high-quality and innovatively designed building, informed by its surroundings and context.
- 4.20 Paragraph 154 states that new development should *“help to reduce greenhouse gas emissions, such as through its location, orientation and design”*, and *“take account of landform, layout, building orientation,*

*massing and landscaping to minimise energy consumption*" (paragraph 157). The Proposed Development incorporates measures, inherent to the design, to achieve this. Details are provided in this Statement and in further details in other core planning documents submitted with this application presenting a significant improvement to the performance of this scheme compared to the previous one.

- 4.21 NPPF paragraph 174 requires a contribution to and enhancement of the natural local environment, including through *"minimising impacts on and providing net gains for biodiversity"*. The Proposed Development provides opportunities for private planting on a site where there are currently no natural habitats. This is achieved through the enhanced external amenity space that will be provided at split levels and connecting to all three properties within the Site.
- 4.22 Regarding the Site's location adjacent to the Kew Foot Road Conservation Area, the NPPF requires heritage assets to be conserved *"in a manner appropriate to their significance"* (paragraph 189) with applications providing a description of the significance of the asset including the contribution it makes to setting (paragraph 192). A detailed assessment of the proposals is provided in the Heritage Statement (and in the Design and Access Statement) outlining the significance of the Site. LBRuT officers considered that this was acceptable before, in terms of the Lower Mortlake Road frontage and any considerations relating to scale and massing are addressed through the changes in the current scheme.
- 4.23 The NPPF is clear that, *"where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use"* (paragraph 202). It is added that *"in weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset"* (paragraph 203).

#### **Planning Policy Guidance**

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

## The Development Plan

### The London Plan (2021)

4.25 The following London Plan policies are of relevance to the Site and Proposed Development:

- Policy GG1 (Building strong and inclusive communities) seeks to *“deliver strong and inclusive communities”* by ensuring that new buildings are designed to reinforce the legibility of neighbourhoods, and adaptable to changing community requirements.
- Policy GG2 (Making the best use of land) seeks to *“create high-density, mixed use places”* by exploring the potential to intensify land uses to support additional homes.
- Policy GG3 (Creating a health city) requires developments to improve Londoner’s health by promoting active and healthy lifestyles.
- Policy GG4 (Delivering the homes Londoners need) aims to ensure that more homes are delivered throughout London, including specialist housing, through the use of small sites.
- Policy GG5 (Growing a good economy) seeks to ensure that London provides sufficient levels of high-quality housing, such as co-living, to maintain economic competitiveness.
- Policy D1 (London’s form and characteristics) aims to ensure that land is used efficiently and maximizes density, and that schemes *“respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality.”*
- Policy D3 (Inclusive design) requires that the highest standards of accessible and inclusive design
- Policy D7 (public realm) requires developments to *“ensure public realm is safe, accessible, inclusive, attractive, well-connected... relates to the local and historic context, and incorporates the highest quality design.”*
- Policy H2 (Small sites) outlines the importance of small sites in the delivery of housing in London, and gives *“the presumption in favour of small housing developments which provide between one and 25 homes.”* The policy specifically references infill developments on vacant and underused land, as is the case here, and sites within PTAL zones 3-6 or within 800m of a tube station.
- Policy HC1 (Heritage conservation and growth) requires developments which affect heritage assets to *“conserve their significance and appreciation within their surroundings”*
- Policy SI1 (Air quality) requires developments to prevent or minimize exposure to existing air pollution, and make provision to address local problems of air quality
- Policy SI5 (water infrastructure) seeks to ensure that developments *“improve the water environment and ensure that adequate wastewater infrastructure is provided”*
- Policy SI8 (Waste capacity and net waste self-sufficiency) sets out the criteria which new proposals should be evaluated against in relation to waste disposal

- Policy SI13 (Sustainable Drainage) requires developments to *“aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.”*
- Policy T5 (Cycling) sets out the minimum standards for the provision of cycle parking for new developments.
- Policy T6 (Car Parking) seeks to limit the car parking provided in any development. It states that *“car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity.”* It states that any development within PTAL 5-6 should be car-free.

LBRuT Adopted Local Plan (2018)

4.26 The following LBRuT Local Plan policies are of relevance to the Site and Proposed Development:

- Policy LP1 (Local Character and Design Quality) establishes that all new development will be of *“high architectural and urban design quality”*
- Policy LP2 (Building Heights) requires that new buildings strengthen the setting of the borough’s townscapes, and generally reflect the prevailing building heights within their vicinity.
- Policy LP3 (Designated Heritage Asset) states that new developments should *“conserve and, where possible, make a positive contribution to, the historic environment of the borough”* by preserving and enhancing the character and appearance of conservation areas
- Policy LP8 (Amenity and Living Conditions) establishes that all development is required to protect the amenity and living conditions of the occupants of new and existing properties, by ensuring that the design of new buildings enable good living standards
- Policy LP10 (Local environmental impacts, pollution and land contamination) seeks to ensure that new development does not lead to *“detrimental effects on the health, safety and the amenity of existing and new users of occupiers of the development site, or the surrounding land”* It seeks to ensure acceptable levels of air quality, noise and vibrations, light pollution, odours and fume control, land contamination, and construction and demolition disturbances.
- Policy LP11 (subterranean developments and basements) seeks to resist the development of basements of more than one storey below the existing ground level.
- Policy LP16 (Trees, woodlands and landscape) requires that existing trees are protected, and that developments provides new tree, shrubs and other vegetation in order to deliver amenity and biodiversity benefits.
- Policy LP20 (Climate Change Adoption) is consistent with NPPF paragraph 149 in terms of seeking developments to be resilient to the future impacts of climate change.
- Policy LP21 (Flood risk and sustainable drainage) sets out the requirements for carrying out flood mitigation measures.
- Policy LP22 (Sustainable design and construction) requires that developments *“achieve the highest standards of sustainable design and construction to mitigate the likely effects of climate change”*.



- Policy LP23 (Water resources and infrastructure) states that developments which pose an unacceptable threat to the borough's rivers, surface water and groundwater quality will be resisted.
- Policy LP24 (Waste Management) sets out the borough's requirements in relation to waste management.
- Policy LP34 (New Housing) outlines the borough's targets for the delivery of housing up to 2025. The plan aims to deliver an additional 3150 units from 2015-2025.
- Policy LP39 (Infill, backland and back garden development) requires that infill development must *"reflect the character of the surrounding area and protect the amenity and living conditions of neighbours."*
- Policy LP 40 (Employment and Local Economy) outlines the principles through which the Borough aims to maintain a diverse and strong local economy.
- Policy LP42 (Industrial land and business park) states that there is a presumption against the loss of industrial land, and that the loss of industrial space will only be permitted where it can be clearly demonstrated that *"there is no longer a demand for an industrial based use in this location and that there is not likely to be in the near future."*
- Policy LP44 (sustainable travel choices) aims to ensure that developments provide sustainable means of transport and minimize congestion, air pollution and carbon dioxide emissions.
- Policy LP45 (parking standards and servicing) requires that new development makes provision for the accommodation of vehicles in order to provide for the needs of the development while minimizing the impact of car-based travel.

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

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

4.28 In addition, LBRuT have published the following which have informed the proposed scheme and the assessment.

- Richmond and Richmond Hill Village Planning Guidance SPD (2016);
- Design Quality SPD (2006);
- Refuse and Recycling Storage Requirements SPD (2015); and
- Conservation Area SPG (2002).

**Policy Conclusions**

- 4.29 The Site is currently vacant having formerly been used as a car wash, car parking and for the storage and sale of Christmas trees. The Proposed Development of the Site to provide high quality co-living (sui generis) floorspace at 47a Lower Mortlake Road alongside internal and external amenity space in the adjacent 47 and 49 Lower Mortlake Road is supported in principle in the Development Plan and would achieve the most efficient and optimum use of the Site, meeting both strategic policy targets and local needs.
- 4.30 The policy basis and planning guidance support for the provision of additional living accommodation is a key consideration and the Proposed Development assists and is wholly consistent with the delivery of this Borough, and London-wide and national strategic objective.
- 4.31 The Site, by virtue of it being unused and not well maintained is considered to detract from the street scene. National (NPPF), regional (London Plan) and local (LBRuT Local Plan) policy all support high quality design which improves the appearance of Sites, especially adjacent to Conservation Areas, as is the case here, where the proposals are in-keeping with the setting of the adjacent Conservation Area.
- 4.32 The Proposed Development is considered to be consistent with the NPPF, and the Development Plan, in terms of the principle of development and also in terms of design and other technical matters including transportation, neighbour amenity and sustainability.
- 4.33 Section 5 sets out a comprehensive assessment of the Site and Proposed Development's compliance with the Development Plan and other material considerations including the NPPF.

## 5. PLANNING ASSESSMENT

5.1 This section outlines a detailed assessment of the Proposed Development against the planning policy context identified in Section 4. Reference is made throughout to the DAS, plans, drawings and other consultants' documents submitted in support of the planning application where more detail can be found.

### Decision-Making Approach

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

5.3 The Proposed Development represents sustainable development, as defined by the objectives in paragraph 8 of the NPPF, for reasons which are summarised below and further supported in the comprehensive technical material that is being submitted in support of this planning application:

- **Economic Objective:** the Proposed Development will not harm the building of a strong, responsive and competitive economy through the 'occupation' of the Site and proposed appropriate co-living use. There is a strategic drive to deliver additional living accommodation (on a local, regional and national level) and this can help "to support growth" (NPPF paragraph 8) through the maintenance of housing supply to meet demand associated with job creation and investment opportunities. As such the proposals are considered consistent with the NPPF and specific strategic parts of the Development Plan.
- **Social Objective:** the Proposed Development will make a series of contributions helping maintain a strong, vibrant and healthy community. The Proposed Development, through the design approach adopted, creates a high-quality built environment, ensuring the integrity and the quality of the street scene is upheld. Furthermore, the design of the building ensures that it is inclusive and accessible to all. The scheme also meets identified and demonstrable local needs through the provision of co-living accommodation. This accords with relevant parts of the NPPF and the Development Plan, including London Plan Policies GG1, GG2, GG3, GG4 and GG5, and Local Plan Policies LP1, LP8 and LP10 in particular. It also accords with the GLA's 'Accessible London' guidance.
- **Environmental Objective:** the Proposed Development will contribute towards the protection of the natural environment through the introduction of sustainable design and materials and the optimised use of the Site in an accessible and sustainable location. The historic and built environment will be protected and also enhanced due to the high level of design applied to the proposed building and the impact that this will have on the street scene, including the Conservation Area and other considerations. As such the Proposed Development is consistent with Chapters 12 and 16 of the NPPF and a number of

development management policies in the adopted Development Plan, outlined in this Section of this Planning Statement. The proposals are also consistent with design policies set out in the Development Plan and the NPPF.

5.4 Having established that the Proposed Development is acceptable in principle and represents sustainable development, this assessment now turns to specific development management matters, with the key issues to be tested as part of this assessment being:

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

#### **Loss of Existing Uses**

5.5 It is material to note that LBRuT previously accepted the unsuitability of the Site for such uses and therefore its 'loss' as part of the Proposed Development should remain acceptable in principle. This point was also not contested by the Inspector with her acknowledgement that the proposed co-living use would be a benefit.

5.6 As described earlier in this Planning Statement, the Site is currently vacant having formerly been used as car parking, a car wash, and a yard to hold Christmas trees. None of these uses were the subject of planning applications by the previous owners, and all the uses have now ceased.

5.7 Although the Site is considered to be a non-designated industrial site (specifically a builder's yard), it is evident by virtue of its vacancy that there is no demand for that use at this location, and it is unlikely for demand to emerge in the future. The Site was marketed through a commercial agent for employment and storage uses from February 2017 up to the submission of the 2019 scheme (ref: 19/3352/FUL). Due to the restricted access to the Site and lack of turning circle for larger vehicle, there was little interest, and it was considered to be unsuitable by prospective occupiers. This is set out in the material included at Appendix 1, submitted again with this application.

5.8 The marketing of the Site exceeds the requirements set out in Appendix 5 of LBRuT's Local plan, which state that sites should be marketed for a period of two continuous years. Therefore, it is considered acceptable

by LBRuT Local Plan Policy LP42 and London Plan policy E4(c) for the Site to be redeveloped for residential purposes.

- 5.9 The marketing summary report (at Appendix 1) has previously been supplemented by additional marketing record material, prepared by Savills, that provides further details on the marketing of the Site and has previously been accepted by LBRuT officers and the Planning Inspector as sufficient to justify the loss of the existing use. The Applicant instructed this additional marketing report in 2020 for the previous submission at the Site (ref: 19/3352/FUL) and it is considered that this information remains relevant for this application. No further interest in the Site has materialised in the time that has elapsed.

### **Appropriateness of Proposed Uses**

- 5.10 The Site is on an established residential street and, as outlined above, is considered to be appropriate for redevelopment. The provision of co-living floorspace is consistent with strategic aims, nationally, regionally and locally, in terms of the delivery of housing. The NPPF (chapters 5 and 11) emphasises this point and this is reflected in London Plan Policy GG4 and LBRuT Local Plan Policy LP34.
- 5.11 As the proposed redevelopment relates to an infill site, the appropriateness of the proposed residential use needs to be demonstrated in accordance with the requirements of Local Plan policy LP39, and the factors set out within the policy, which are addressed below:
- i. As the Proposed Development is terraced, it retains similar spacing between new buildings to the established spacing within the neighbourhood.
  - ii. The Proposed Development retains plots of sufficient width for adequate separation between dwellings.
  - iii. The proposal retains the existing garden space for adjacent dwellings.
  - iv. The proposal retains the existing building roof-line with its neighbouring dwelling.
  - v. Through the enhancement of Blue Anchor Alley, the proposal is considered to significantly benefit the street frontage, and legibility of the area.
  - vi. The design of the proposal has been informed by the form and styles of buildings in the vicinity of the Site, and uses materials sympathetic to its surroundings.
  - vii. The proposal will not result in any loss of privacy to the existing surrounding homes or gardens.
  - viii. The proposal meets the required standards for recycling and refuse storage as well as cycling parking as set out in the London Plan and Local Plan.
  - ix. The proposed scheme will not result in any negative visual impact on neighbours, in fact it can be said that it will enhance the streetscape through the regeneration of an unused and unattractive site.

5.12 By virtue of satisfying these tests under Local Plan policy LP39 for the redevelopment of an infill site, the principle of the proposed residential development is therefore considered to be acceptable in this location. Again this is something that LBRuT officers and the Inspector have all previously accepted.

5.13 On a more specific note, the Proposed Development is consistent with the policy requirements and guidance in relation to the following criteria:

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

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

5.14 Against this background, the Proposed Development complies with the requirements of the NPPF and the Development Plan in terms of delivering an appropriate use in a sustainable location on an infill site and, of considerable importance, delivering strategic national, regional and local policy requirements. The Proposed Development is not considered to fall under the C3 use class (something that the Inspector has accepted by saying that the units are not ‘self-contained’ and that they are akin to HMO accommodation), and as such the delivery of affordable housing is not a policy requirement. The proposed co-living scheme seeks to offer a flexible form of accommodation to meet a specific demonstrable need, and can therefore be considered inherently affordable in itself (at circa £800 to £1,000 pcm for a co-living unit with access to the wider facilities). Nevertheless, an Affordable Housing Statement (including Viability Report), prepared by ULL, is submitted with this application, which demonstrates that the scheme cannot support affordable housing. This reflects the agreed position between the Applicant (Appellant) and LBRuT during the recent appeal.

#### **Impact on Neighbour Amenity**

5.15 The scheme has been fully tested to ensure its appropriateness and its acceptability in terms of planning policy requirements and guidance. In terms of the impact on daylight and sunlight, the built form of the Proposed Development is considered acceptable. TFT have undertaken a daylight / sunlight analysis and their report submitted in support of this application states that, *“The VSC results indicate that 45 (85%) of the 45 windows considered will fully comply with BRE target values ... [and that] ... The majority of the windows that fall below the suggested BRE benchmark are secondary windows serving rooms that have the benefit from receiving daylight from other windows”*. The report goes on to conclude that, *“The NSL results indicated that 30 (88%) of the 34 rooms considered will fully comply with the BRE target values.”* Further

detail is included in this report which concludes, *“The Proposed Development will have a negligible effect to the sunlight the relevant neighbouring properties current receive.”* The Proposed Development is therefore considered to satisfy policy objectives, and is noticeably better than the previous scheme, noting the massing changes responding to the Inspector comments and those of LBRuT officers.

- 5.16 Vehicular trips by future residents will be limited, as no car parking spaces are to be provided. Servicing, deliveries and refuse collection are expected to be limited, and will enter from the front of the proposed building, off Lower Mortlake Road, in accordance with existing rules and restrictions and consistent with other properties along the street. In terms of 47 and 49 Lower Mortlake Road, on the basis that only new amenity space (internal and external) is proposed, there will be no additional trips, vehicular or otherwise. The Applicant will ensure that the Site will be managed to allow refuse collection to access bins from the bin store to the rear of the Site to the for collection. Full details of these elements are set out in the accompanying Transport Statement and DAS.
- 5.17 Plant equipment is to be located within the proposed building and in less sensitive locations externally as required. As such, there will be no noise issues associated with plant equipment. Future residents (in 47a, 47 and 49) will have access to outdoor private amenity spaces, although these have been positioned so as to remove unreasonable noise and disturbance on neighbouring residential properties. Full details of the noise impact approach are set out in the Acoustic Report (prepared by Auricl) and plans submitted in support of this planning application.
- 5.18 The Proposed Development complies with national, regional and local requirements, making the scheme acceptable against the requirements in Sections 12 and 15 (paragraph 180 in particular) of the NPPF, London Plan Policy D14 and LBRuT Local Plan Policies LP8 and LP10.

### **Design Approach**

- 5.19 An important planning consideration is whether the Proposed Development is considered to be acceptable in terms of design, paying particular regard to the immediate surroundings and the local context including the setting of the adjacent Conservation Area.
- 5.20 The design and layout approach of the Proposed Development is outlined in full in the submitted plans and drawings and DAS (prepared by Boehm Lynas) which present the layout, scale and appearance of the Proposed Development. Detailed elevational drawings have also been prepared and show the proposed fenestration and palette of materiality of the scheme.
- 5.21 Recognising national and local policy requirements and guidance, the scheme has been carefully designed to respond to the specific constraints and opportunities of the Site; respect the local character and context

of its surroundings, notably the neighbouring Conservation Area; and meet the needs of the Applicant in providing a viable and deliverable scheme capable of securing the benefits associated with the proposals.

- 5.22 The Proposed Development's design has also evolved following the refusal of the previous application and appeal dismissal. Responding to the Planning Inspector's comments regarding an imposing built form, the Applicant has cut back the building at 1<sup>st</sup> floor, reducing the bulk of the building adjacent to the rear neighbour (3 Avoca Villas), which will also improve conditions in 47 and 49 Lower Mortlake Road (outside the red line).
- 5.23 As part of pre-application discussions with LBRuT officers, specific questions have been asked about the nature of the proposed front lightwells. This is set out in the DAS in detail, including a detailed explanation of these lightwells and other examples of other lightwells in the Borough and elsewhere.
- 5.24 The Proposed Development has accordingly been designed to achieve the objectives of Chapters 12 and 16 of the NPPF. In particular, the proposals are considered to optimise the potential of the Site, through an innovative design considered to improve the character and quality of the area.
- 5.25 In designing the scheme, the architects have undertaken a thorough approach to understanding and complimenting local character, both in terms of size, scale and design through to materials being used historically and more recently. As such, the Proposed Development is consistent with London Plan Policies D3, D4, D5, D6 and, owing to the architectural quality of the proposed building, Policy D2.
- 5.26 Considering the LBRuT policies, the Proposed Development complies with Local Plan Policy LP1, LP2, LP8, LP22 and through the careful design of the scheme and respectful relationship with its surroundings (including the Conservation Area), LP3.
- 5.27 The evolution of the scheme, in design terms, has been borne out through engagement with LBRuT during and following our pre-application meeting, as well as following the decision of the previous application and appeal.

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

- 5.28 Further to the assessment of the design approach more generally, the NPPF is clear that heritage assets, namely the Conservation Area and nearby locally listed properties, are to be conserved "*in a manner appropriate to their significance*" (paragraph 189).
- 5.29 As required by paragraph 194 of the NPPF, the accompanying Heritage Statement (prepared by Heritage Collective) provides a description of the significance of these assets, and assessment of the impact or effects of the Proposed Development. The Statement says that, in terms of the Conservation Area, the



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

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

### **Transport and Accessibility**

- 5.31 A Transport Statement prepared by TTP accompanies this application and demonstrates the acceptability of the Proposed Development in respect of the impact of the proposals on the local highway network, specifically in relation to the approach to car parking; the level of cycle parking provision; and the deliveries, servicing and refuse collection strategy.
- 5.32 The Site is accessible by non-car modes, including excellent levels of access to public transport (the Site has a PTAL rating of 6a) as well as walking and cycling links in the vicinity of the site. There are well maintained footways connecting the Site and these offer convenient access to the local area and amenities as well as public transport opportunities.
- 5.33 The scheme is particularly focused towards those traveling by non-car modes, through being a car-free development (and restricted access to on-street parking permits) and the provision of 20 cycle parking spaces, with 16 within 47a Lower Mortlake Road and a further 4 spaces (2 stands) to the front of 47 and 49 Lower Mortlake Road (exceeding cycle-parking standards).
- 5.34 On the basis of the assessment undertaken as part of the Transport Statement, the scheme is considered to comply with the terms of NPPF (Chapter 9), where sustainable transport solutions are promoted and also Chapter 8 (Promoting Communities). The proposals are consistent with London Plan Policies GG3, T5 and T6, and LBRuT Local Plan Policies LP44 and LP45.

### Energy and Sustainability

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

- High quality building fabric and materials, including high performance solar glazing (where possible), high levels of air tightness and a reduction in thermal bridging, to minimise energy consumption and loss;
- Use of high efficiency heating and lighting and control;
- Installation of energy efficient applications, where possible.
- Enhanced daylight usage to minimise energy use;
- Use of Air Source Heat Pumps that extract latent energy from the air providing significant embodied energy savings.

5.36 In addition to the scheme design and energy efficiency and performance of the proposals, the Proposed Development is inherently sustainable by virtue of the level of accessibility by modes other than private car and also the promotion of trips on foot and by bicycle (see Transport Statement), a point also recognised by the Inspector in the July 2021 decision.

5.37 The London Plan (particularly Policy SI2) sets out the sustainability aspirations for new development. The Proposed Development will follow the energy hierarchy, to secure a significant reduction in regulated CO2 emissions. The Proposed Development provides a 57.9% reduction in on-site carbon emissions compared to the Part L 2013 baseline. This is also consistent with Policy LP22 of the LBRuT Local Plan.

5.38 In summary, the Proposed Development is considered to comply with the NPPF (Chapter 15 in particular), London Plan Policies SI1, SI2 and SI7, and Local Plan Policy LP22.

### Surface and Foul Water Drainage

5.39 A Surface and Foul Water Drainage Strategy (including Flood Risk Assessment) prepared by Constructure accompanies this application. This demonstrates that it is possible to drain the Site in a sustainable manner, with acceptable discharge rates from the Site. Assisting with this it is suggested that a blue roof system to aid the attenuation of excess water is introduced. In terms of flood risk, this report concludes that the Proposed Development *"will contribute to a reduction in flood risk ... by providing a significant reduction in both peak discharge rates and reducing volume during peak storm intensities"*.

- 5.40 The report concludes that the Proposed Development is in line with London Plan Policy SI13 and Local Plan Policy LP23.

**Fire Safety**

- 5.41 In terms of fire safety, a Fire Statement, prepared by CHPK, is submitted as part of this application. This sets out the design approach to ensuring that the risk of fire spread is minimised, and fire protection measures are in place, having been fed into the design of the scheme.
- 5.42 Overall, the approach taken in relation to safety and fire security is considered to be acceptable. In planning terms, the Proposed Development therefore complies with paragraph 99 of the NPPF (which sets out the promotion of public safety, addressing site-specific threats), and London Plan Policy D12 (which requires the highest standards of fire safety).

## 6. SUMMARY & CONCLUSIONS

6.1 The Proposed Development represents a positive investment on Lower Mortlake Road through the provision of additional high-quality co-living floorspace, designed to meet demonstrable local housing requirements and need. Moreover, it delivers a modern, sustainable and high-quality design approach and associated improvements, including new and enhanced internal and external amenity spaces, representing an appropriate response to the character of the Site and immediate area, recognising the location of the Site adjacent to the Kew Foot Conservation Area.

6.2 The Proposed Development presents a clear opportunity to deliver the following important economic, social and environmental benefits:

- Demonstrable sustainable development in line with the NPPF and London Plan, facilitating the delivery of housing to meet required local needs.
- Provision of a sustainable and high-quality building and associated works, representing a sympathetic and appropriate response to the character of the adjacent Conservation Area.
- Provision of co-living accommodation with modern, high-specification space suitable to meet demonstrable local needs.
- Introduction of extensive new internal amenity space to enhance the neighbouring existing HMO properties, shared between HMO tenants in each of these separate buildings, alongside attractive split level communal gardens between the three properties of 47a, 47 and 49 Lower Mortlake Road.
- Building upon the accessible location with an existing excellent level of public transport and pedestrian and cycle accessibility and introducing design measures including site layout, design and management to encourage enhanced pedestrian and cyclist accessibility.
- Incorporation of sustainable technologies and building improvements to achieve energy efficiency and carbon reduction targets.
- Transformation of a currently vacant and underutilised infill site, which currently detracts from the quality of this section of Lower Mortlake Road frontage and Blue Anchor Alley, to provide an appropriate use and representing a 'good neighbour' in terms of amenity effects.
- Generate Community Infrastructure Levy payments for local benefit.

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

## APPENDIX 1 – MARKETING SUMMARY REPORT

Paragraph 18.0.4 of appendix 5 of Richmond’s Local Plan requires that a marketing report is submitted alongside planning applications for changes of use from employment uses, in order to demonstrate that there is no demand for a site in its current use. The following report sets out the nature of the marketing for the site at 47a Lower Mortlake Road.

The site was used as a car wash from 1st October 2008 – 28th February 2016, and has since been vacant. The site has been actively marketed by Martin Campbell Commercial Property Consultants as open storage space since 1st February 2017, at a rate of £30,000 per annum. The site was marketed for a period of 29 months, up until July 2019 when the Martin Campbell board was taken down. The property continued to be advertised on the Martin Campbell website.

The site was advertised online at the following link: <http://www.martincampbell.co.uk/Property-Details/47a-Lower-Mortlake-Road-Yard-Area-TW9-2LW/497.html?Location=&QueryLocation=&Type=&QueryType=&Tenure=&QueryTenure=&MinSize=&MaxSize=>.

A marketing board was erected at the site (see below image) when marketing commenced and remained there until July 2019.



Although enquiries were received in relation to the site, ultimately the restricted access and lack of turning circle meant that the site was seen by potential occupiers as unsuitable for storage uses.

Westlake Property Limited purchased the site on 18<sup>th</sup> September 2018 and have relied on the following reports received by the vendor and Martin Campbell, the letting agent, for background marketing and lettings information prior to their period of ownership:

From the vendor, J Burman:

***“Car wash – 1<sup>st</sup> October 2008 – 28<sup>th</sup> February 2016 at the rate of £1,500 per calendar month. With our permission, they sold Christmas trees from the premises during December each year. The yard has been empty since this date and Martin Campbell took on the letting of it with no success.”***

From the letting agent, Martin Campbell:

***“There would be demand for storing ‘light’ building materials, but the restricted access and lack of turning circle for larger vehicles would render it unsuitable for a builders merchant. There would be more demand from other users, such as a car wash or car storage, but the same site restrictions would deter applicants and most parties would be unsuitable covenants for a standard lease.”***

Marketing Particulars:



**MARTIN CAMPBELL**  
COMMERCIAL PROPERTY CONSULTANTS

**INDUSTRIAL / WAREHOUSE TO LET**

**47A LOWER MORTLAKE ROAD, (YARD AREA), RICHMOND UPON THAMES, TW9 2LW**




**SUMMARY**

- 2,695 sq ft (250.46 sq m)
- Open Storage Area
- Excellent access to the A316
- To Let
- Available
- Rent: £30,000

**AMENITIES**

- Mains Services
- Potential Reception Building
- Remote Electric Gates
- Secure Perimetre Brick Wall

**020 8940 2266**  
6 Duke Street Richmond TW9 1HP

[www.martincampbell.co.uk](http://www.martincampbell.co.uk)



**LOCATION**

Richmond is a highly affluent town located some 8 miles south west of London and boasts a generous selection of shops, restaurants and attractions including the very popular riverfront and Village Green. This site is situated just off Richmond Circus Roundabout, a 5 minute walk from Richmond Station (District Line, Overground and National Rail). The A316 is easily accessible and provides quick access to the M3, M4 & M25.

**RENT**

£30,000

**RATES**

£3,862

**DESCRIPTION**

The property comprises an area of hard standing open storage with a former 'reception office'. The property benefits from electric security gates, mains water, waste and electricity. The site is bound by a high brick wall which provides excellent security and privacy.

**ACCOMMODATION**

FLOOR	SIZE
Yard	2,000 sq ft (185.87 sq m)
Reception Office	200 sq ft (18.50 sq m)
<b>Total</b>	<b>2,200 sq ft (204 sq m)</b>

**LEASE**

The property is available by way of a new lease - terms to be agreed

**RENT**

£30,000

**RATES**

£3,862

**VAT**

VAT is applicable

**EPC RATING**

N/A

**LEGAL COSTS**

Each party to be responsible for their own legal costs.

**VIEWING**

Viewing strictly by prior appointment with the agent:

Richard Farndale  
T: 020 8940 2266  
E: r.farndale@martincampbell.co.uk

Marketing Particulars are for information only and do not constitute an offer of any property. The information is provided for information only and does not constitute an offer of any property. The information is provided for information only and does not constitute an offer of any property. The information is provided for information only and does not constitute an offer of any property.