



Our Ref: 02B904985  
Your Ref: 21/3107/FUL

09 November 2022

FAO Lucy Thatcher  
By Email Only: lucy.thatcher@richmondandwandsworth.gov.uk

Dear Lucy

**21/3107/FUL - BARNES HOSPITAL, SOUTH WORPLE WAY, EAST SHEEN, LONDON**

On behalf of Star Land Realty UK Ltd (the Applicants), please find enclosed amended planning drawings and supporting documents in relation to the residential planning application (ref. 21/3107/FUL) submitted for Barnes Hospital, South Worple Way.

The amendments follow consultation responses received post submission, including from London Borough of Richmond upon Thames (LBRuT) Officers and statutory consultees. This cover letter provides a summary of the responses received prior to setting out the proposed amendments which have been made to address these comments.

**Consultation Responses**

Feedback from LBRuT officers has been received on a number of matters throughout the course of the application consultation, which have subsequently been responded to by the applicant. The matters covered include the following:

- Highways;
- Design;
- Residential standards;
- Neighbour amenity;
- Arboriculture;
- Waste; and
- Viability

A schedule which summarises the comments received and the associated responses, including those received during the latest round of feedback from LBRuT in May 2022, is provided at **Appendix 1**.

**Proposed Amendments**

The proposed amendments can be summarised as follows:

- Amendment to planning application red line boundary to enable the delivery of the SEN school and health centre plots under the permitted under outline planning permission (OPP) reference 18/3642/OUT;

- Alterations to the dormer windows (including removal dormer on the far right in elevation 4 of Block C and addition of skylight);
- Amendment to Block C ground floor layout including alterations to the refuse store;
- Updates to the accessible unit layouts in response to comments;

The application site boundary is required to be amended in order to enable the delivery of the SEN school and health centre plots under the permitted under outline planning permission (OPP) reference 18/3642/OUT. As a result, it has been necessary to update the planning drawings to reflect this amendment as well as the other minor changes outlined above.

It was requested by LBRuT that this amendment to the plot boundaries also be captured and regularised within the OPP, to ensure no conflict arises between the drop-in application and the OPP; enabling both permissions to co-exist. A non-material amendment (NMA) application has therefore been submitted by Montagu Evans on 23 September 2022 to amend plot boundary plan approved under the OPP. The application is currently pending validation.

## **Submission Documents**

Enclosed is a full suite of revised architectural drawings to reflect the updated site boundary.

For completeness, also enclosed is a full suite of revised technical documents and plans. Where the amendments have not resulted in any changes to the conclusions made within the original reports Statements of Conformity have been provided to confirm this is the case.

A schedule of all superseded documents and plans and their subsequent revisions is provided at **Appendix II**.

We trust that the information provided is sufficient to enable the determination of the application. Should you require anything further, please contact either Anna Harray on 07818103642 at this office.

Yours sincerely



For and on behalf of Avison Young (UK) Limited

# Appendix I

## LBRUT Consultation Response Schedule

(ref. 21/3107/FUL)


### Consultation Responses Received March 2022

Statutory Consultee	No.	Comment	Response
Highways	1	It is not sufficient to state that the sale of the parking spaces will enable the provision of affordable housing particularly given no viability evidence of this has been submitted. This is contrary to policy, and will therefore be identified as harm in the planning balance. On a separate matter, your clients may wish to consider the benefits of more flexibility with the allocation of spaces, given the increase in electric vehicles and only 20% of active provision being provided.	There will be a covenant to ensure that the spaces will not be sold to anyone that does not live in the development. This is in accordance with London Plan Policy T6.1 – refers to “should” not “must”.
Design	2	<p>It is strongly recommended the following revisions are made in relation to the dormers:</p> <ul style="list-style-type: none"> <li>- Those illustrated on the attached plans with crosses should be omitted – they can be replaced with rooflights noting your reasoning for the dormers in terms of achieving adequate light to the units. (Those dormers remaining within the southern elevation are likely to be identified as harm in the planning balance).</li> </ul>	<p>Revisions to the proposed development, including the dormers, have been agreed with LBRUT following post-submission meetings.</p> <p>The revised strategy is set out in the updated Design and Access Statement.</p>

	3	<ul style="list-style-type: none"> <li>- Where dormers are proposed in pairs, these need to be reduced in size (as indicated by bubbles). At present they compete with the scale of the gables, resulting in an overly fussy congested roofscape, and appear overly dominant compared to other fenestration. Noting the size of some of the units significantly exceed the NDSS it is not considered that reducing them in size would result in the size of the units being unacceptable.</li> </ul>	
Residential Standards	4	<p>The majority of units are single aspect. The London Plan states that single aspect dwellings should only be provided where it is considered a more appropriate design solution ... and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy and avoid overheating. As you mention in your response, only the daylight aspect has been considered. As such this is likely to be identified as a harm.</p>	<p>The proposed blocks run on a north-south axis and therefore have an East-west orientation as established by OPP. There are no single aspect north facing units. The applicant acknowledges that there are some lateral aspect units which were established by the OPP. The proposed bay windows provide additional aspect for these units as per the Design Code.</p> <p>All units have adequate level of daylight, natural ventilation and south facing units have dual aspect to prevent overheating. Housing standards and quality requirements are met.</p> <p>We will confirm the quantum and percentage of single aspect units compared with the OPP, noting that we are working to a footprint which is outline consented and therefore we are unable to change the layout.</p>
	5	<p>Your response in relation to separation distances states that the blocks follow the footprint of the OPP, however page 46 of the DAS illustrates that this is not the case, further the annotations on this drawing do not seem to meet each side of the building. The OPP distances and those of concern within the proposed development have been attached. Whilst it is noted that gables/bays are staggered, there are still habitable windows directly facing each other in close proximity. Currently there is significant concern over the quality of the accommodation. Such limited gaps between habitable facing windows are not a feature of the area nor</p>	<p>A Site Plan Overlay (ref. 18387-03009) was Issued to LBRUT on 3 August 2022 which demonstrates that the distances achieved between Blocks B and C are greater than the parameter plan distances for the OPP.</p>

		reflects the established pattern of development, and therefore officers are struggling how such proximity can be warranted. The Council has guidance on separating distances with SPD, notably, the small and medium housing sites SPD refers to 13.5m (for windows facing onto walls with no windows, or 20m where windows face windows). This scheme is clearly contrary to such and there are no mitigating factors. The separating distances accepted in the Outline scheme are the minimum. It is therefore recommended this matter is addressed as a priority, and the current layout cannot be supported.	
Neighbour Amenity	6	57-75 Grosvenor Avenue have been assessed in terms of daylight/sunlight/overshadowing – 77-79/81 also need to be assessed.	<p>The Daylight, Sunlight and Overshadowing (DSO) report assessing the proposed development's impact to neighbouring properties has concluded that there will not be a significant impact on surrounding properties arising from the proposed residential development at Barnes Hospital.</p> <p>Having regard to 57-75 Grosvenor Avenue more specifically, the Daylight and Sunlight Report shows that the proposals would comply with the BRE criteria. Noting that 77 to 79 and No.81 are further away from the Proposed Development, it is not considered these properties require testing as they would fully comply with the BRE criteria. no</p> <p>For sunlight, the BRE recommends that sunlight assessment is carried out for neighbouring windows where these windows are within 90 degrees of due south. All windows on Grosvenor Avenue facing the proposed development are north facing meaning that they are not at risk of sunlight loss as a result of the proposed development, and therefore not included in the sunlight assessment as per BRE methodology.</p>

			<p>Since the proposed development is located north of Grosvenor Avenue, any overshadowing and sunlight effects will be to the east, west and north of the scheme rather than the south where Grosvenor Avenue is.</p> <p>Therefore, in conclusion, further testing is not required.</p>
	7	The generally accepted distances to mitigate overlooking as outlined within policy LP8 are guidance and likely refer to two storey dwellings, not taking account of the additional height proposed here and the resulting relationship of a 4 storey building with two storey dwellings. The windows illustrated with crosses will therefore need to be omitted, and replaced with rooflights if necessary. The remaining dormers within the southern elevation are therefore likely to be identified as harm in the planning balance.	The proposed revisions include updates to the dormers following further post-submission discussions with officers to overcome this concern.
	8	Secondary and non-habitable windows within the upper floors of the southern elevation will need to be obscurely glazed, which will be conditioned	Obscure glazing on secondary non-habitable rooms can be conditioned.
Trees	10	CAVAT values cannot be conditioned and require such information prior to determination.	A revised Arboricultural Report including a CAVAT Assessment was issued to LBRUT in March 2022.
Waste	11	There appears to be a shortfall in the number of bins proposed – block A shortfall of 4, block B shortfall of 3 and block C shortfall of 4 1100L bins in line with the SPD requirements.	Revised waste store information submitted to LBRUT on 5 April 2022 and is reflected in the revised Design and Access Statement.
	12	Whilst not yet an SPD requirement, the Council is committed to expanding its food waste recycling service to blocks of flats. Therefore space to provide an additional 240L bin within each store would be supported.	
	13	The refuse strategy must be set out in legally binding document to ensure that it continues in perpetuity as the council cannot collect bins from basement level bin storage or in excess of 20m from the highway.	
	14	The Council could need free access to the general waste bins, and both streams of recycling bins on the same day. Therefore the waste collection	

		area must be large enough to accommodate all 25 x 1100L bins that are needed. The number of bin spaces in the collection area is not shown.	
	15	3 x additional bins per bin store are required to remain in the bin stores on collection day whilst the rest of the bins are in the collection area. This is to ensure residents have somewhere to deposit waste whilst the bulk of the bins are presented in the collection area on the weekly collection day. Space to store these either needs to be accommodated in the waste stores, or they could be stored in the collection area during the week and transported to the waste stores on collection day.	
	16	The swept path analysis for the refuse collection vehicle appears to shown very close contact with what may be the railway wall when reversing in to the site from South Worple Way, can it be confirmed that there is adequate space to conduct this manoeuvre?	Updated Swept Path Analysis submitted to LBRUT on 27 March 2022.
	17	<p>Furthermore the parked vehicle is shown blocking access to the collection area. The vehicle needs to be able to wait in such a way as the bins can be extracted from the collection area. The screen shot below highlights both of these points:</p> 	

## Consultation Responses Received May 2022

Statutory Consultee	No.	Comment	Response
Waste	1	Plans now demonstrate that 25 bins plus the required surplus bins can fit in the space, however there is no room for manoeuvre which is considered to cause an issue on collection day. A second door is therefore required into the collection point.	Comments addressed as part of revised submission and reflected in the revised Design and Access Statement.
	2	Requested that the Block C plan demonstrates that adequate room for the small bins in collection area	
Design	3	Alterations to dormers are now accepted, with the exception of the northern most end dormer within elevation 2 of block B which needs to be reduced in height in line with the other dormers within this elevation	Comments addressed as part of revised submission and reflected in the revised Design and Access Statement.
	4	Views required of the reduced eaves on Block A to demonstrate visibility from ground level in order to determine the least harmful design approach.	
Trees	5	Proposed reduction of T6 of 7m in height is excessive – a full crown reduction of no more than 4m is acceptable.	The updated Tree Report issued 09.03.22 is in accordance with the tree officer's comments – refer to Para. 4.5.1.
	6	Noted that the Arb report states states "There is ample room for the siting of cabins and storage of materials / spoil during the construction phase without impacting on trees", however the TPP does not show the positioning of site welfare or storage areas for plant, machinery and materials. Requested that this information is clarified and shown on the TPP	
Housing	7	<p>M4(3) dwellings that are to be social rent for LBR nomination are required to be built out as fully accessible and not adaptable as the Council will be nominating applicants from their Physical Disability Queue who are waiting for wheelchair accessible properties.</p> <p>The size of the social rent M4(3) home proposed appears likely to be too small at 54msq. 1:100 plans are required for this flat with everything included (all measurements of rooms, hallways, appropriate kitchen length, space requirements inside front door and in all the rooms, appropriate sized bathroom, wheelchair charge space) to demonstrate compliance.</p> <p>For the 1B2P home, the following concerns were raised:</p> <ul style="list-style-type: none"> <li>The bathroom is not large enough (Part M requires 2200x2600mm or 2450x2450mm) and the bathroom is currently only 2000x2300mm and will need to be enlarged (also, an accessible layout needs to be shown – see Part M Example 3.16A and B – the LPAs example template is also attached at the end of the Wheelchair Housing Site Brief).</li> </ul>	Further detail provided as part of revised submission and reflected in the revised Design and Access Statement.



		<ul style="list-style-type: none"> <li>• There is no clear turning area in the living room, and because the room is so narrow, the necessary placement of the furniture means that there is no clear route through to the window and no spaces for transfer on/off sofas or dining chairs</li> <li>• The door to the kitchen clashes with the storage cupboard doors</li> <li>• The kitchen needs to show 6130mm worktop length</li> <li>• The balcony does not appear to provide a turning area or extended leading edge of 1800mm</li> <li>• The location of the front door to the flat is awkward as it is right next to the communal door (meaning that the resident will need to go well past their door in order for the communal door to close, and is also at risk of the communal door opening on them whilst they are entering or exiting their flat).</li> </ul>	
Viability	8	Requested that a detailed alternative proposal is provided as part of the rebuttal, including current day costs and values.	An alternative scheme is being progressed which will be provided as part of ongoing discussion relating to viability.
	9	<p>Request to include First Homes as part of the Viability Assessment, with the onus being on the applicant to justify that FH are unviable. Requesting that the following is included in the VA:</p> <ul style="list-style-type: none"> <li>• whether FH is viable or not, including commentary/analysis of deliverability of FH as a product</li> <li>• what impact FH would have on the scheme, e.g. if it is interspersed with Affordable Homes would the Registered Provider want to manage these within their block; or if contained within a private block with high service charges, would this make it unaffordable etc.</li> <li>• would there be any impacts on a developer's ability to bring on a Registered Provider for the other affordable products</li> </ul>	The exclusion of First Homes from the Viability Assessment was previously agreed with LBRUT July 2021.
Demolition	10	Requested that details regarding the demolition of the link building be provided, including details of phasing and methodology for part demolition and making good of the retained building	Further information issued alongside amendments to the OPP.

# **Appendix II**

## **Barnes Hospital – Deliverables Schedule**

09 November 2022

<b>Deliverable</b>	<b>Consultant</b>	<b>Submission Iteration</b>	<b>Post-Submission Revision</b>	<b>Revised Application – November 2022</b>
<b>Detailed drawings</b>	Scott Brownrigg	Dated 18 November 2021	Numerous revisions made	Revised suite of drawings; Barnes Drawing Register Rev 5, dated 12 October 2022
<b>Design and Access Statement</b>		Revision 5 – dated 18 November 2021	-	221013 SBR-ZZ-XX-RP-A-0003 DAS Barnes, Rev 8 – dated 12 October 2022
<b>Planning Statement</b>	Avison Young	Dated 18 November 2021	-	-
<b>Heritage &amp; Townscape Statement</b>	Montague Evans	Dated November 2021	-	Statement of Conformity 221102 Barnes Hospital HTVIA SoC_v2 Final – 2 November 2022
<b>Health Impact Assessment</b>	Montague Evans	Dated November 2021	-	Barnes HIA - Updated November 2022

<b>Deliverable</b>	<b>Consultant</b>	<b>Submission Iteration</b>	<b>Post-Submission Revision</b>	<b>Revised Application – November 2022</b>
<b>Landscaping Statement and Plans</b>	Exterior	Dated November 2021	Revisions made February 2022	<p>ExA_1954_DAS_900 – 10 October 2022</p> <p>1954-EXA-00-ZZ-DR-L-1000 GA PLAN – P3</p> <p>1954-EXA-00-ZZ-DR-L-1001 DETAIL PLAN - SHEET 01 – P3</p> <p>1954-EXA-00-ZZ-DR-L-1002 DETAIL PLAN - SHEET 02</p> <p>ExA_1954_Barnes Hospital_Drawing Issue Register 001</p>
<b>Arboricultural Impact Assessment / Method Statement</b>	Crown	Dated 18 November 2021	Updated 8 March 2022	<p>10770 Arboricultural Method Statement &amp; Tree Protection Plan - October 2022.</p> <p>10770 Tree Report for Barnes Hospital – V3</p> <p>10770 All Tree Drawings - V3</p> <p>10770 Tree Schedule</p>
<b>Ecology Report</b>	Aspect	Dated 28 July 2021	-	Statement of Conformity, ref. 1005222-05 021 let conformity ah

<b>Deliverable</b>	<b>Consultant</b>	<b>Submission Iteration</b>	<b>Post-Submission Revision</b>	<b>Revised Application – November 2022</b>
<b>Biodiversity Net Gain Assessment</b>	Aspect	Vf1 - 15 November 2021	Vf2 (still dated November 2021)	Statement of Conformity, ref. 1005222-05 021 let conformity ah
<b>Transport Assessment</b>	Motion	Final Rev B - Dated 17 November 2021	-	R01 - Transport Statement - 2022-10-20
<b>Delivery and Servicing Management Plan</b>		Final Rev B - Dated 17 November 2021	-	R03 - Framework DSMP - 2022-10-20
<b>Travel Plan</b>		Final draft – dated 17 August 2021	-	-
<b>Construction Traffic Management Plan</b>		Final Rev B – dated 17 November 2021	Final Rev C – dated 18 February 2022	R04 - Framework CTMP - 2022-10-20
<b>Daylight / Sunlight Report</b>		XCO2	Dated November 2021	-

<b>Deliverable</b>	<b>Consultant</b>	<b>Submission Iteration</b>	<b>Post-Submission Revision</b>	<b>Revised Application – November 2022</b>
<b>Air Quality Assessment</b>	RPS	Rev 3 – 16 November 2021	-	-
<b>Energy / Sustainability Report</b>	Flatt	Rev 4 – 15 November 2021	-	3038 Barnes Energy Statement 211022 Iss6
<b>Overheating Report</b>	Flatt	Rev 2 – 19 November 2021	-	3038 Barnes Block B TM59 Overheating Report Iss4 211022
<b>Utilities Statement</b>	Flatt	Rev 4 – dated 15 November 2021	Rev 5 – dated January 2022	3038 Barnes Hospital Utility Statement for Planning Iss6_071022
<b>Noise Assessment</b>	Paragon Acoustics	Rev A – 17 November 2021	-	20210803_4431_NVS_03 – 10/10/2022
<b>Sustainable Construction Checklist</b>	Verde	20 August 2021	-	-

<b>Deliverable</b>	<b>Consultant</b>	<b>Submission Iteration</b>	<b>Post-Submission Revision</b>	<b>Revised Application – November 2022</b>
<b>Archaeological Assessment</b>	AOC	Dated 28 July 2021	-	AOC_24064_Barnes_Hospital_20221003
<b>FRA and Drainage Report</b>	RBG	Rev P08 - dated 18 November 2021	-	4881-RBG-ZZ-XX-LOF-ST-00001 - Planning Letter of Conformance
<b>Foul Drainage Statement</b>	RBG	Rev P04 – dated 18 November 2021	-	4881-RBG-ZZ-XX-LOF-ST-00001 - Planning Letter of Conformance
<b>Basement Impact Assessment</b>	RBG	Rev P03 – 22 November 2021	-	4881-RBG-ZZ-XX-LOF-ST-00001 - Planning Letter of Conformance
<b>Statement of Community Involvement</b>	JBP	Dated August 2021	-	-
<b>Contaminated Land Assessment</b>	RSK	Rev 03 – 13 August	-	1920884 R01 (04) ZH

<b>Deliverable</b>	<b>Consultant</b>	<b>Submission Iteration</b>	<b>Post-Submission Revision</b>	<b>Revised Application – November 2022</b>
<b>Viability Report</b>	Savills	August 2021	Discussions ongoing	Discussions ongoing
<b>Affordable Housing Statement</b>	Savills	-	-	-
<b>Fire Statement</b>	Sweco	Rev 4 – 17 November 2021	Rev 5 – dated 12 April 2022	66200502-SWE-XX-XX-RP-N-0001-P04-Barnes Hospital Residential FSS - 221017
<b>BREEAM Assessment</b>	Envision	Rev A – 16 August 2021	-	-