



JUNE 2024

Planning Statement

Avalon House, 72 Lower Mortlake Road, Richmond,
TW9 2JY

Iceni Projects Limited on behalf of
Stagecoach Pension Trustee
Company Ltd & The Stagecoach
Pension Trustee Company (No.2)
Ltd

June 2024

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ICENI PROJECTS LIMITED
ON BEHALF OF
STAGECOACH PENSION
TRUSTEE COMPANY LTD &
THE STAGECOACH
PENSION TRUSTEE

Planning Statement
AVALON HOUSE, 72 LOWER MORTLAKE ROAD,
RICHMOND, TW9 2JY

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1. INTRODUCTION

1.1 This Planning Statement has been prepared by Icení Projects Limited ('Icení') on behalf of Stagecoach Pension Trustee Company Ltd & The Stagecoach Pension Trustee Company (No.2) Ltd c/o Barings Real Estate ("the Applicant") in support of a planning application for full planning permission for development at Avalon House, 72 Lower Mortlake Road, Richmond, TW9 2JY ('the Site').

1.2 This application seeks full planning permission for the following description of development:

Remove the existing roof and erection of a roof extension at fourth floor and rear extensions to floors ground – four to accommodate additional commercial floorspace (Class E), provision of rear and rooftop terraced amenity spaces, alterations to the ground floor entrance, recladding and remodelling of the façade, landscaping improvements to the rear carparking area, provision of end of journey and cycle parking facilities, associated building servicing and sustainability improvements, and other associated works.

1.4 The purpose of this Planning Statement is to provide the London Borough of Richmond Upon Thames ("the Council") with an overall summary of the existing site and surroundings; the relevant planning history for the site and to provide justification for the Proposed Development in the context of the London Borough of Richmond Upon Thames Local Plan and national planning policies. Furthermore, this Planning Statement demonstrates that the scheme detailed in this planning application offers several unique benefits including:

- The scheme is fully aligned with the Economic, Social and Environmental pillars of the NPPF.
- Taking a retrofit approach through retaining, extending and optimising the existing building to enhance its employment generating capacity as a prime commercial asset within a city centre location.
- The scheme has been conceived with the core tenets of sustainability, carbon resilience, wellness and biophilia in mind, creating a premium-grade workspace that celebrates its place within the context of Richmond Park and Kew Gardens.
- Appropriately responding to the massing and built form of the Site and its immediate context.
- Improve the efficiency and legibility of the existing building entrance such that it presents a more active and permeable relationship with the street scene.

- Enhancing the visual quality of the building’s primary façade to Lower Mortlake Road.
- Maintain the existing levels of amenity enjoyed by neighbouring properties in relation to daylight and sunlight, overlooking and privacy, and noise.
- Optimisation of employment-generating capacity of the building, through the provision of both new and refurbished commercial office floor space (Class E), capable of meeting best in class sustainability metrics, and which is end user and staff wellness focussed, modern, fit-for-purpose and future proofed.
- Improving the amenity and staff wellness of future occupants of the Site through the provision of terraced amenity spaces and winter gardens, provision of end of journey facilities, and enhancing the daylight and natural ventilation levels within the commercial floorplates.
- Improve the energy and resource efficiency of the building.

Submission Documents

1.5 In addition to this Planning Statement and Application Form prepared by Icen Projects as part of the planning application, the following documents and drawings have been prepared and submitted in support of this planning application:

Document title	Author
Site Location Plan	Anomaly
Proposed and Existing Floorplans, Elevations, Sections	Anomaly
Design and Access Statement	Anomaly
Noise Assessment	Hoare Lea
Daylight Sunlight Assessment	Development and Light
Transport Statement	Iceni Projects
Outline Construction Management Plan	Iceni Projects
Delivery and Servicing Plan	Iceni Projects
Framework Travel Plan	Iceni Projects
Fire Safety Statement	Hoare Lea
Energy and Sustainability Statement	Hoare Lea
Whole Life Carbon and Circular Economy Statement	Hoare Lea
Flood Risk Assessment and Sustainable Drainage Strategy	Elliot Wood
Arboricultural Impact Assessment	Hayden’s Arboricultural Consultants
Statement of Community Engagement	Iceni Projects

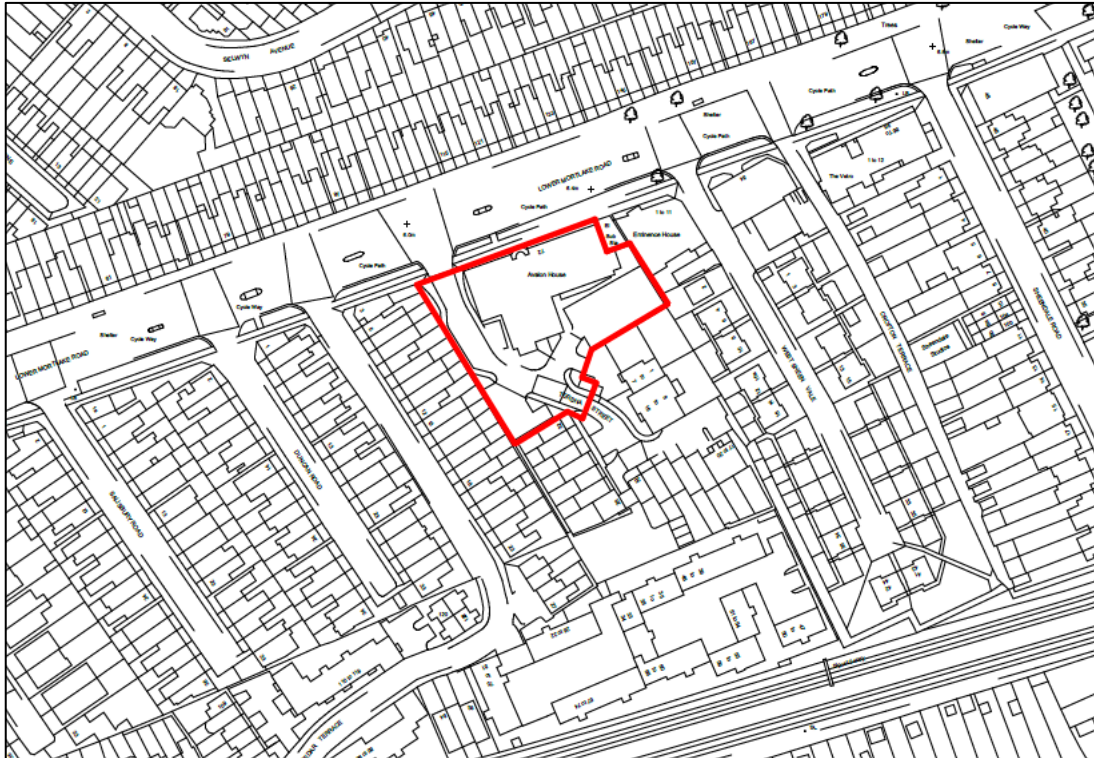
Document title	Author
Air Quality Assessment	Air Quality Consultants
Biodiversity Net Gain Assessment	Arbtech
Preliminary Ecological Appraisal and Roost Assessment	Arbtech

2. APPLICATION SITE AND BACKGROUND

Site Description

- 2.1 The Site is located on the southern side of Lower Mortlake Road and comprises a three storey commercial office building. The building, known as 'Avalon House', was constructed in the early 2000's and accommodates 3,076sqm (GIA) of Commercial (Class E) floorspace.
- 2.2 The building comprises of ground and first floor as brick / stone massing, while the existing second floor and large roof extents are clad in grey metal. To the rear of the property, the roof has a dormer which is where the current plant is located. The 'entrance' bay is expressed with a semicircular extrusion which is elevated at roof level, creating a useable meeting space at fourth floor level.
- 2.3 The property is a multi-tenanted office building, with a shared central reception and core facilities, access from the primary pedestrian entrance from Lower Mortlake Road.
- 2.4 The Site benefits from access to a shared internal vehicular road, known as Tersha Street, which also provides access to the residential properties to the south. Tersha Street is accessed from a driveway to Lower Mortlake Road. This road provides access to two car parks with a combined 33 spaces to the rear of the building, with a larger 23 space car park directly adjacent to the south of the building, and a smaller 10 space car park to the west of Tersha Street. A small area with capacity for three visitor car parking spaces is also provided to the west of Tersha Street, in closer proximity to the vehicular entrance point.
- 2.5 There are currently a small number of external cycle lockers, located to the rear of the building and with accommodation for ten bicycles. There is one shower within the core space, with no dedicated end of journey facilities. An external substation is located within the eastern boundary of the Site.
- 2.6 In terms of planning designations, the Site is identified in Richmond Council's 'Key Office Areas' under the current adopted Local Plan (2018), and this designation remains unchanged under the Draft Local Plan, albeit it is being rebadged as a 'Key Business Area'. The Draft Local Plan additionally identifies the Site as being in the Richmond and Richmond Hill Residential Urban Design Study Area, an Area for Incremental Intensification, and a Public Open Space Deficiency Area.
- 2.7 The Site is not identified as comprising any listed buildings, nor is it situated a Conservation Area. The Sheendale Roach Richmond Conservation Area is located some distance to the east of the Site, on the eastern side of Crofton Terrace.

Figure 2.1 – Site Location Plan



Source: Anomaly

Site Context

2.8 The Site's immediate context is characterised by a variety of buildings which vary in scale and design. These are summarised as follows:

- **North:** beyond the pedestrian footpath is a dual carriageway dedicated cycle lane, and beyond this is Lower Mortlake Road (A316). Further north are several two storey terraced dwelling houses with frontage to Lower Mortlake Road.
- **East:** adjoining to the east are a series of 3 larger and taller buildings (3/4 + storeys in height) on the southern side of Lower Mortlake Road which Avalon House is part of and bookends to the west. These buildings are summarised as follows:

Eminence House (72-84 Lower Mortlake Road) adjoining the Site to the east which is a ground plus four storey residential flat building constructed in 2009 (LPA Ref: 04/1387/FUL). Prior approval was granted (LPA Ref: 13/2655/P3JPA) to change the use of the existing ground floor offices to residential to form 4 x 1 bed apartments.

Independence House (84 Lower Mortlake Road): Further east is Independence House which is a taller ground plus four storey commercial office building with a step mansard roof level with

visible plant and core pop up above and hardstand parking to the rear and at basement level. Planning approval was granted in 2021 (LPA Ref: 20/3359/FUL) for rebuilding and extensions to the existing fourth floor and rear extensions to provide additional office space and external terraces.

It does not appear that this scheme has been implemented, and the Council's planning search references an in-progress application (LPA Ref: 23/3232/FUL) which seeks the change of use of the building from Class E to Class C3 to provide 21 apartments along with some extension at roof level generally within the envelope of a previously approved scheme.

Vetro House (86-88 Lower Mortlake Road): Further east is The Vetro, is a part four, part three-storey residential flat building constructed in the approximately 2006-2007 (LPA ref: 04/1498/FUL). Prior approval was granted in 2021 (LPA Ref: 21/0111/GPD15) to change the use of the existing ground floor commercial unit to 1 x 2 bedroom apartment.

- **South:** Adjoining the Site to the south a residential development which was constructed over 20 years ago as part of a master plan to redevelop the former Council 2-bedroomch included Avalon House (LPA Ref: 97/1106/DD01). The development comprises approximately 30 flats and comprises a two-storey brick terraced residential buildings.
- **West:** beyond Tersha Street are a row of two storey brick terraced dwelling houses with frontage to Cedar Terrace.

2.9 The Site also benefits from a public transport accessibility level (PTAL) of 6a, indicating excellent access to public transport. The Site is within less than 10 minutes walking distance to Richmond Station which is serviced by the South Western Railway, London Overground, and the District Line. The Site also lies in close proximity to bus stops on Lower Mortlake Road, which provide access to services with routes across west and southwest London.

2.10 The Site is, therefore, in a highly sustainable location for the use sought, with all the infrastructure required to support the proposed development in situ, including pedestrian and cycle infrastructure and public transport connectivity.

Planning History

2.11 The site has been subject to various planning applications. The most relevant to this application are summarised in Table 2.1 below.

Table 2.1 Summary of relevant applications

Application ref.	Description	Status
97/1106/OUT	Development For B1 (office) And Residential Use.	Approved 09/02/1998

Application ref.	Description	Status
98/1856	Demolition Of Existing Buildings and Construction Of New 3-storey Office Block With Roof Top Plant Room, New Shared Access Road, And Ancillary Car Parking.	Approved 07/10/1998
97/1106/DD01	Redevelopment Comprising 10 X 1 Bedroom Flats, 10 X 2 Bed Flats, 11 X 3 Bedroom Houses And 1 X 4 Bedroom House, Together with Associated Roads And Parking.	Approved 02/03/1999
99/0608	Variation Of Condition Ns01u of Planning Permission 97/1106/OUT.	Approved 19/05/1999
06/0565/ES191	To certify that the current use of the premises is as offices within Use Class B1.	Approved 29/03/2006

2.12 As detailed in the above, the building has not been subject to any refurbishment since it was originally constructed in the early 2000s. Therefore, the building is in need of comprehensive refurbishment to meet modern day commercial needs.

2.13 The relevant planning permissions granted for the Site available online do not contain any land use restrictions. As a result, the existing lawful use of the building is open Class E.

The Applicant and Project Background

2.14 The proposals are being promoted by Barings Real Estate, who are the Investment Manager on behalf of the owners of the Site, Stagecoach Pension Trustee Company Ltd & The Stagecoach Pension Trustee Company (No.2) Limited ('the Applicant'). Collectively, these two partners have a long-term interest in the Site and are now seeking to reposition the asset to secure its long-term viable future.

2.15 Barings, formerly Cornerstone, is one of the world's largest diversified real estate investment managers, offering a broad spectrum of solutions across private real estate debt and equity. As at 30th September 2023, its Assets Under Management stood at \$45.7 Billion. The portfolio is global, diverse and includes all major property types. With regards the UK there is a particular focus on creating highly efficient and sustainable office floorspace. Barings is a subsidiary of MassMutual and further information can be obtained by visiting www.baring.com.

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- 2.16 Barings consider ESG at each stage of investment and focus on the long-term impact of every decision they make.
- 2.17 The building was constructed over 20 years ago as part of a master plan to redevelop the former Council depot (LPA Ref: 97/1106/OUT). This development also saw the construction of the residential buildings directly adjoining the Site to the rear (south), along with the creation of Tersha Street and associated landscaping works including the hardstand vehicular parking.
- 2.18 The building is now dated and with a headlease on the building that expires in 2025. There are some sub-tenants in situ on short term agreements along with some vacancy. In its current form the building will not attract high-quality tenants and is therefore in need of investment to secure its long-term viability as an employment-generating asset for Richmond. This scheme is therefore being progressed as a long-term investment in the building to retrofit, reposition, and future proof the asset to enhance its sustainability credentials and employment capacity. These elements of the brief all form part of the wider objective to deliver end-user focused, modern, fit-for-purpose and future-proofed commercial accommodation.
- 2.19 Barings tasked the design team to evaluate a range of design options guided by these principles, with achieving best in class sustainability metrics and enhanced biophilia being at the heart of the scheme. This has included reviewing whether additional massing can be provided at roof level and to the rear, improving the overall design quality of the façade through a new cladding system, considering how end user wellbeing, wellness and end of journey facilities can be provided, and also ensuring the building is energy efficient, sustainable and resilient through refurbishment works.
- 2.20 The Applicant wishes for the scheme to be known as 'The Greenhouse' and become an exemplar for how to approach a sustainable retrofit and repositioning of commercial assets in the London Borough of Richmond-upon-Thames.
- 2.21 The design approach for the Site has been based on a detailed series of design workshops which have included input from architectural, daylight and sunlight, structural, MEP and sustainability, and town planning specialists, which have determined that the best way to achieve the Applicant's objectives are through retrofitting, refurbishing, and extending the building.

Pre-Application Discussions

- 2.22 In advance of submitting the planning application, the Applicant has engaged in formal pre-application discussions with planning and design officers from the Council (ref. 24/P0003/PREAPP). This included a meeting on 6th February 2024, with written feedback received on 15th March 2024.

2.23 These pre-application discussions saw officers provide their in-principle support for the proposed development, and saw the project team receive the following feedback:

Principle of Development:

- The proposal seeks to expand and enhance the current level of office space, in accordance with Policy LP41 (Office) Part c), it therefore complies fully with Policy LP41 and the principle of development is therefore supported.

Local Employment Agreement:

- On the basis that the development is likely to create more than 20 FTE jobs, a Local Employment Agreement (LEA) would be secured through a Section 106 agreement. This is also supported by London Plan Policy E11 Skills and opportunities for all.

Design:

Additional Floor and Roof Extension

- The principle of the proposed extensions is supported; however, officers challenged the design team to look at options to reduce the bulk and massing of the western flank elevation facing Tersha Street.
- The design and massing of the extension are including the proposed pitched form vertical fenestration emphasis, and side elevation treatment is considered appropriate and supported.
- The use of textured and patterned brickwork appears to be successful, and it is welcomed that the stone facing and brickwork at lower levels is retained.
- Preference for brick materiality on the western flank elevation to reference the residential setting of this interface.

Two Storey Side Infill Extension

- The two-storey side infill extension proposed to the south west of the existing building is supported in principle.

Stair Core Extensions

- Having regard to their siting towards the back of the building and the modest scale of the enlargement, no concerns were raised in regard to this element of the proposal.

Other Alterations

- The alterations to the ground floor entrance including the principle of removal of the existing semi-circular entrance are supported.

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- However, as outlined above, more should be done to break up the massing of the front elevation.
 - The proposed materials and improvements to the façade are considered appropriate and supported in principle.

Neighbouring Residential Amenity:

- A comprehensive BRE assessment will need to be undertaken in respect of the proposed development and should be provided with any subsequent application.
- Any future application would be required to be accompanied by a Plant Noise Assessment.
- A Noise Management Plan will be required in relation to the use of the proposed terraces.

Transport:

- The application site is located within PTAL 6a and is within the Controlled Parking Zone N – North East Richmond, which operates between 10.00 and 16.30, Monday – Saturday.

Vehicular Parking

- No additional car parking is proposed as part of the development, and the loss of two parking spaces is proposed to facilitate additional cycling parking which is acceptable.
- Policy compliant provision is proposed for electric vehicles, currently 20% active provision and 20% passive provision.

Cycle Parking

- The applicant needs to demonstrate that they can provide cycle parking in accordance with standards set out in the adopted London Plan.
- The submission appears to suggest an uplift in cycle parking of 70 spaces, from 10 to 80 which is welcome.

Waste and Servicing

- The Applicant will need to submit a servicing and delivery management plan.
- A servicing and delivery plan needs to be provided with any future application.
- The applicant will need to submit a construction logistics plan and needs to have regard to the relevant supplementary planning guidance.
- TfL would be consulted on any formal application due to the proximity of the A316.

Trees:

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- The location of this proposal is not within a Conservation Area, nor are there any TPOs on site, however there are large, well established street trees in front of the site on Lower Mortlake Road.
 - The area around nearby trees will be required to be suitably protected from both direct and any indirect construction activity, and not used for the storage of any materials and/or machinery.

Sustainability:

- Any formal application would be required to be supported by an Energy statement and Sustainability Construction checklist (SCC) which provides details of various measures and the be lean, clean, green and seen hierarchy.
- In terms of 'Be Green' the most suitable energy strategy and how they would contribute to a reduction over the Building Regulations 2021 should be confirmed.
- Further savings in terms of 'Be Lean' should be confirmed through energy efficient insulation in the building fabric such as the walls, windows and doors.
- The 'Be Clean' requirements this requires buildings to where possible connect to a decentralised heating network, or where on-site provision is not feasible should be designed to be readily able to connect to a network, should one become available in future.
- The submission should also address the 'Be Seen' layer of the hierarchy.

Air Quality:

- The site is within an Air Quality Focus Area as identified in Appendix C of this document and the SPD requirements will need to be addressed in any submission.
- The SPD notes that all developments proposed in or adjacent to these areas must play their part in ensuring that air quality in these areas does not worsen and must contribute towards an overall improvement in air quality. Therefore, development within these areas need to robustly demonstrate that the impact of both direct and indirect emissions can be fully mitigated.

Fire Safety:

- Information to satisfy the policy requirements (Policies D12 (Fire Safety) and D5 (Inclusive Design) should be provided upon submission of any application.

Biodiversity Net Gain:

- Biodiversity Net Gain should be considered as part of the proposals.

2.24 Officers also encouraged early community engagement, given the sensitive nature of the proposed development.

2.25 The proposals have evolved in response to the feedback and comments received, as outlined in the Design and Access Statement and this Planning Statement.

Community Engagement

2.26 A Statement of Community Engagement has been prepared by Icen Projects and sets out a summary of the consultation that took place during the pre-application stage.

2.27 The pre-application community engagement can be summarised as follows:

- A dedicated consultation website and online feedback form was created - <https://72lowermortlake.co.uk/>
- A dedicated consultation email and telephone number to receive feedback and any enquiries about the Site was also set up.
- Leaflets were delivered to 266 homes and businesses providing an outline of the proposal and a link to the consultation website.
- Local ward councillors were also contacted about the proposals and offered meetings, with the consultation start times provided.

2.28 During the consultation period, the Project Team received a total of seven responses from residents, one online feedback form, one phone call and five emails. Each resident was responded to individually.

2.29 Further detail on the consultation materials distributed and the feedback received in response to the development proposals are outlined in the accompanying Statement of Community Engagement.

3. PROPOSED DEVELOPMENT

3.1 This planning application seeks full planning permission for the following:

Remove the existing roof and erection of a roof extension at fourth floor and rear extensions to floors ground – four to accommodate additional commercial floorspace (Class E), provision of rear and rooftop terraced amenity spaces, alterations to the ground floor entrance, recladding and remodelling of the façade, landscaping improvements to the rear carparking area, provision of end of journey and cycle parking facilities, associated building servicing and sustainability improvements, and other associated works.

3.2 Specifically, this application seeks full planning permission for the following works:

- Removing the existing roof, bringing the façade up one full storey, and constructing a sensitive roof extension at fourth floor in a pitched roof form.
- Extensions to the rear including a small two storey infill at the south-western corner of the building, along with an extension to the stair core to provide access to a new communal roof terrace at third floor.
- Improvements to the ground floor to create a better front door and improve wayfinding to the building's lobby/reception space for the commercial offices above.
- Selected works to improve the primary façade including new windows at third floor, with a remodelled façade above in materials and finishes that complement the immediate vicinity.
- Provision of a private landscaped terrace spaces to floors two and four at the building's southern elevation, and the provision of a communal terrace space at third floor at the southern elevation.
- Comprehensive landscaping improvements to the rear car parking area including provision of new EV charging points, enhanced planting, permeable paving and other SUDs improvements.
- Provision of end of journey facilities including a new dedicated external cycling parking area with PVs above.
- Associated building servicing and overall sustainability improvements.

3.3 Specific details of the proposal are outlined in the full set of proposed plans and Design and Access Statement prepared by Anomaly which accompany this application.

- 3.4 A photomontage of the proposed development from its Lower Mortlake Road elevation is provided at Figure 3.1 below.

Figure 3.1 – Photomontage of the proposed development – from Lower Mortlake Road



Source: Anomaly

Access and Parking

- 3.5 The car parking provision would remain as existing, with the loss of four spaces to accommodate additional cycle parking. This would continue to be accessed from Lower Mortlake Road, via Tersha Street.
- 3.6 There would be a significant uplift in the number of long-stay cycle parking spaces on the Site, to 66 spaces from an existing total of 10.
- 3.7 The existing and proposed parking accommodation at the Site can be summarised as follows:

	Existing Spaces	Proposed Spaces	Percentage Change
Car	33	29	-12%
Bike	10	66	+560%

Land Use Area Schedule

- 3.8 Overall, the proposals would result in the provision of 4,070 sqm Gross Internal Area (GIA) of commercial (Class E) floorspace, a net increase of 992sqm in overall GIA when compared to the existing scenario. An existing versus proposed area schedule can be found below:

Table 3.1 Existing vs proposed area schedule

Use	Existing sqm (GIA)	Proposed sqm (GIA)	Net Change sqm (GIA)
Commercial (Class E)	3,069	4,068	+992
Total	3,076	4,068	+992

4. PLANNING POLICY

4.1 Section 38(6) of the Planning and Compulsory Purchase Act requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise. This section identifies the principal planning policy considerations which have informed the development proposals, and which provide the context for the consideration of this planning application, as well as other material considerations. The current development plan consists of:

- The London Plan (2021)
- The Local Plan (2018)

4.2 Other material considerations include:

- National Planning Policy Framework (2021)
- National Planning Practice Guidance (2021)

4.3 The London Borough of Richmond Upon Thames also have a number of Supplementary Planning Documents (SPDs / SPGs / VPGs) which form material considerations for this application. These include:

- Village Plan – Richmond and Richmond Hill (2016)
- Design Quality SPD (2021)
- Sustainable Construction Checklist (2016)
- Development Control for Noise Generating and Noise Sensitive Development SPD (2018)
- Planning Obligations PSD (2020)

4.4 Richmond Council are in the process of preparing their new Local Plan, which was submitted to the Secretary of State in January 2024. The next stage is for the Draft Local Plan to be examined by an independent Inspector, with examination hearings scheduled to take place in June and July 2024. Adoption of the New Local Plan is anticipated during Winter 2024/25.

4.5 The emerging policies from the Draft Local Plan shall start to have further weight attributed to them in decision making as the policies undergo examination.

National Planning Policy

- 4.6 The National Planning Policy Framework (NPPF) provides the planning policies for England and how these should be applied. This section provides an overview of the Government's national planning policy and guidance that is relevant to the proposed development.
- 4.7 The updated National Planning Policy Framework (NPPF) was published in December 2023 and sets out the Government's economic, environmental, and social planning policies. The NPPF outlines a presumption in favour of sustainable development as being at the heart of the planning system.
- 4.8 The National Planning Policy Guidance (NPPG) is a web-based resource that was published on 6 March 2014 and provides information and guidance on planning. The NPPF and NPPG form material considerations in the determination of the application.

The London Plan (2021)

- 4.9 The London Plan (2021) forms part of the Richmond Council's Development Plan meaning the policies within it are a material consideration in the determination of this application. Relevant policies contained within the document are set out below:
- Policy GG2 (Making the best use of land)
 - Policy D1 (London's form, character and capacity for growth)
 - Policy D3 (Optimising site capacity through the design led approach)
 - Policy D4 (Delivering good design)
 - Policy D5 (Inclusive design)
 - Policy D12 (Fire safety)
 - Policy D13 (Agent of change)
 - Policy D14 (Noise)
 - Policy E1 (Offices)
 - Policy E2 (Providing suitable business floorspace)
 - Policy E11 (Skills and opportunities for all)
 - Policy G5 (Urban greening)

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- Policy G6 (Biodiversity and access to nature)
 - Policy SI 2 (Minimising greenhouse gas emissions)
 - Policy SI 7 (Waste capacity and new waste self-sufficiency)
 - Policy SI 12 (Flood risk management)
 - Policy T4 (Assessing and mitigating transport impacts)
 - Policy T5 (Cycling)
 - Policy T6.2 (Office parking)

Richmond Upon Thames Local Plan

4.10 The Richmond Upon Thames Local Plan was formally adopted in July 2018. The Local Plan is a combined document, replacing the previous policies within the Core Strategy (2009) and Development Management Plan (2011). The Plan sets out the policies and guidance for the development of the borough until July 2033 – or until it is superseded.

4.11 The Site is subject to the following key planning designations:

- Key Office Area (Policy LP41 – Offices)
- Article 4 Direction – Basements
- Modified Article 4 Direction – Class E (Town Centre) to Class C3 (Residential)
- Village Character Area – South of Lower Mortlake Road (Area 4)
- Critical Drainage Area – Richmond Town Centre and Mortlake (Richmond)
- The Site is not identified as comprising any listed buildings, nor is it located within a Conservation Area. However, the Site is located within approximately 200m of three Conservation Areas (Sheendale Road; Kew Foot Road; Central Richmond).
- The Site is not subject to any Local Protected Views.

4.12 In addition to the above, the following policies are relevant to the proposals:

Richmond Upon Thames Local Plan (2018)

- Policy LP1 (Local Character and Design Quality)

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- Policy LP2 (Building Heights)
 - Policy LP3 (Designated Heritage Assets)
 - Policy LP4 (Non-Designated Heritage Assets)
 - Policy LP8 (Amenity and Living Conditions)
 - Policy LP10 (Local Environmental Impacts, Pollution and Land Contamination)
 - Policy LP15 (Biodiversity)
 - Policy LP16 (Trees, Woodlands and Landscape)
 - Policy LP17 (Green Roofs and Walls)
 - Policy LP20 (Climate Change Adaption)
 - Policy LP22 (Sustainable Development and Construction)
 - Policy LP29 (Education and Training)
 - Policy LP40 (Employment and Local Economy)
 - Policy LP41 (Offices)
 - Policy LP45 (Parking Standards and Servicing)

4.13 The following SPD's are relevant to the development and thus form material considerations for this application:

- Village Plan – Richmond and Richmond Hill (2016)
- Design Quality SPD (2021)
- Sustainable Construction Checklist (2016)
- Development Control for Noise Generating and Noise Sensitive Development SPD (2018)
- Planning Obligations PSD (2020)

Richmond Draft Local Plan

4.14 Richmond Council are in the process of preparing their new Local Plan, which was submitted to the Secretary of State in January 2024. The next stage is for the Draft Local Plan to be examined by an

independent Inspector, with examination hearings scheduled to take place in June and July 2024. Adoption of the New Local Plan is anticipated during Winter 2024/25.

4.15 The following emerging policies are considered relevant to the proposals:

- Policy 3 Tackling the Climate Emergency
- Policy 4 Minimising Greenhouse Gas Emissions and Promoting Energy Efficiency
- Policy 6 Sustainable Construction Standards
- Policy 7 Waste and the Circular Economy
- Policy 8 Flood Risk and Sustainable Drainage
- Policy 18 Development in Centres
- Policy 19 Managing the Impacts of Development on Surroundings
- Policy 22 Promoting Jobs and our Local Economy
- Policy 23 Offices
- Policy 25 Affordable, Flexible and Managed Workspace
- Policy 28 Local Character and Design Quality
- Policy 29 Designated Heritage Assets
- Policy 30 Non-Designated Heritage Assets
- Policy 38 Urban Greening
- Policy 42 Trees, Woodland and Landscape
- Policy 44 Design Process
- Policy 45 Tall and Mid-Rise Building Zones
- Policy 46 Amenity and Living Conditions
- Policy 47 Sustainable Travel Choices
- Policy 48 Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management

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- Policy 53 Local Environmental Impacts

5. PLANNING ANALYSIS

- 5.1 This section reviews the key planning considerations arising from the Proposed Development. It provides a reasoned justification for the Proposed Development in the context of relevant policy and the specifics of the Site and its surroundings.

Principle of Development

- 5.2 The Site is located within a 'Key Office Area', under the Local Plan (2018). This designation remains unchanged within the Draft Local Plan, albeit rebadged as a 'Key Business Area'.
- 5.3 Policy LP41 of the Local Plan (2018) states that any proposal for new employment or mixed use floorspace should contribute to a net increase in office floorspace, particularly within Key Office Areas. Similarly, draft policy 21 of the Draft Local Plan seeks to direct new employment development to the designated Key Business Area.
- 5.4 Policy LP40 of the Local Plan (2018) seeks to retain employment floorspace. Similarly, draft Policies 21 and 22 of the Draft Local Plan seek to protect existing employment floorspace for office use, with a no net loss approach.
- 5.5 The proposed development is entirely consistent with the objectives of these policies in that it will deliver both new and refurbished commercial office floor space (Class E). The additional employment space would be located within an identified Key Office/Business Area which the relevant policies seek to encourage. As previously detailed, it is proposed to increase the GIA of the existing building to 4,068 sqm, adding 992sqm of high-quality Class E office space.
- 5.6 The proposed space will be capable of meeting best in class sustainability metrics, which is end user and staff wellness focused, modern, fit-for-purpose and future proofed. The proposed office layouts have been designed as open-plan modern office space, capable of hosting a variety of types and sizes of business. The upper floors of the development have been designed to have the option to be split into two separate premises, should the need arise.
- 5.7 Overall, the proposals are considered to align with both the adopted and emerging policy position which seeks to deliver high-quality commercial office development in the correct locations, and that will support a variety of businesses and a thriving local economy.

Design, Heritage and Townscape

Policy Framework and Background

- 5.8 Good design is a central objective of the London Plan (2021), Policy D4 outlines that new development should deliver high quality design and place-making.
- 5.9 Policy LP1 of the Local Plan (2018) and draft Policy 28 of the Draft Local Plan require all development to be of high architectural and urban design quality. Development should be compatible 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.
- 5.10 In relation to building heights, Policy LP2 of the Local Plan (2018) requires buildings to make a positive contribution towards the local character, townscape and skyline, generally reflecting the prevailing building heights within the vicinity. Draft Policy 45 defines mid-rise buildings as 5 storeys or over, or 15 metres in height from ground floor. Part D of the Draft Policy indicates that the Council will permit Mid-Rise and Tall buildings in areas within or adjacent to areas which include buildings taller than the prevailing height or are subject to substantial redevelopment.
- 5.11 The Richmond and Richmond Hill Village Planning Guidance (2016) identifies the Site as being within Character Area 4 – South of Lower Mortlake Road. This designation is also identified on the Local Plan Policies Map. The guidance notes that there are a series of larger office buildings fronting Lower Mortlake Road which, whilst modern, employ some traditional materials such as brick and timber cladding.
- 5.12 The Site is adjoined to the east by a series of three larger and taller buildings (3/4 + storeys in height) on the southern side of Lower Mortlake Road – Avalon House bookends these properties to the west. The prevailing heights of these buildings, particularly Independence House (84 Lower Mortlake Road), are taller than Avalon House. Planning approval was previously granted in 2021 (LPA Ref: 20/3359/FUL) to extend Independence House upwards. There was, therefore, considered to be an opportunity to increase the Site's massing to better reflect and complement the built form of the surrounding area.

Assessment

- 5.13 The proposals seek to remove the existing roof, bring the façade up by one full storey, and construct a sensitive roof extension at fourth floor, in a pitched roof form. Extensions to the rear will be limited to a small two storey infills at the south-western corner of the building, along with an extension to the stair core to provide access to a new communal roof terrace.

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- 5.14 The replacement building servicing equipment will be situated within the pitched roof form, meaning this would not be visible from the areas of public realm. The proposal includes a green roof with PV panels on the rear part of the pitched roof and stair core pop-up to further increase urban greening across the Site.
- 5.15 The design approach of the rooftop and rear extensions has been guided by the prevailing heights, setbacks, footprint and massing of the Site's immediate context. Specifically, the façade datum line would align with the existing building line of Eminence House adjoining to the east, and the pitched roof form above would align with Independence House further to the east.
- 5.16 The additional massing sought has also been informed by further detailed daylight sunlight analysis. This analysis has confirmed that the site can accommodate additional massing without creating any detrimental impacts on the daylight and sunlight levels to adjoining residential properties.
- 5.17 The upward extension has been carefully designed to minimise the presence of additional massing from a visual and physical experience of the streetscape. Specifically, the pitched roof form of the extension has the effect of softening the massing of the extension, whilst referencing Site's immediate context and relationship with Kew Gardens and the botanical/greenhouse look and feel. This is further emphasised through vertically bringing up a fully glazed element from the building entrance, which further acts to soften the extension and reference the greenhouse design narrative.
- 5.18 In terms of design, the extensions seek to acknowledge and reference the vertical and horizontal proportionality, material palate, scale and detailing, and façade rhythm of the Site and its immediate context. The proposed extension levels are to be treated in a viroc cement panel facade system, which is more in keeping with roof materiality of the street and creates a more subtle palette to offset the brick levels whilst reading as modern built form element.
- 5.19 In their pre-application feedback officers challenged the design team to further consider the transition in heights between the proposed building and the small scale, two storey residential properties to the west, and the subsequent impact this will have on the amenity of properties 1-8 Cedar Terrace.
- 5.20 In response to this, and to address the Officer's concerns, the Applicant has introduced a 'hipped' roof form to the western elevation. The hipped roof takes reference from the surrounding residential context, where there are a number of precedents for a 'bookend' façade wall typology, with a hipped roof to the shorter elevation of a block. The amended roof design helps to soften the impact of the change of roof massing from a straight pitched end wall to a hipped roof design.
- 5.21 As demonstrated in the accompanying design and access statement, there is an existing 20m separation distance between this interface and the existing terrace buildings fronting Cedar Terrace which includes a road and existing landscaping. The Design and Access Statement includes a series

of long and short views of the elevation taken from Lower Mortlake Road. These views demonstrate that the proposed addition of a hip to the form at this elevation is successful in further softening the bulk and massing of the built form from these key views.

- 5.22 The proposed materiality at this interface is brick with punch through windows which would reference the adjacent residential character, further acting to soften the visual impact and dominance of this frontage. This will have the effect of reducing impact to nearby residential properties from the proposed increase in massing.

Landscaping and Urban Greening

- 5.23 Policy LP15 of the Local Plan (2018) encourages development to maximise provision of soft landscaping, including trees, shrubs, and other vegetation that will support the borough-wide Biodiversity Action Plan. Policy LP16 states that the Council will encourage planting, including new trees, shrubs and other significant vegetation where appropriate. Policy LP17 states that development with roof plate areas of 100sqm or more should incorporate a green roof where feasible.
- 5.24 Policy 38 of the Draft Local Plan notes that all new development should integrate green infrastructure and provide for urban greening. Major commercial development is required to achieve an UGF score of 0.3 for commercial development, and all other development is required to include urban greening, although no UGF calculation is necessary. Draft Policy 39 requires non-residential development proposals which increase the footprint and/or floorspace to achieve a target 20% biodiversity net gain.
- 5.25 The Environment Act (2021) requires developments in England to demonstrate a measurable net gain in biodiversity and sets a target of a minimum of 10% BNG for all developments.
- 5.26 At present, the Site already accommodates extensive landscaping with planting currently provided along all site frontages to the public domain. Notwithstanding this, the development proposals have presented an opportunity to increase areas of soft and hard landscaping to improve the visual quality of the existing building and its public realm elements to the rear.
- 5.27 The landscaping design seeks to improve the existing site condition and introduce as much new greenery as possible, in order to soften the rear of the building and improve SUDS. The hard and soft landscaping strategy takes into account user journeys and parking facilities, drainage planting, as well as sub paths and opportunities for green energy sources.
- 5.28 The landscaping design proposed a shared landscape across the rear car park area, with pockets of planting being further introduced to soften areas of hard landscaping. The existing car park surface

is to be replaced with permeable paving – the intent is for greenery to be mixed into the paving to define the car parking spaces.

- 5.29 The Biodiversity Net Gain Assessment, prepared by Arbtech, highlights that the proposed development will result in a 17.3% net gain in habitat units. This is greater than the 10% Biodiversity Net Gain requirement, as set out in the Environment Act (2021).
- 5.30 One of the other key objectives of the proposal is to create sustainable and carbon-conscious design, including the use of sustainable materials and construction methodologies, the introduction of renewable energy sources, green roofs, rainwater harvesting and new landscaping and biodiversity enhancements.
- 5.31 This will include sustainable cladding which surrounds the front and back of the roof extension and continues across the proposed hipped roof. Much of the main roof space is proposed to be green and accompanied by solar panels.

Relationship to Neighbouring Properties

- 5.32 Under Policy LP8 of the Local Plan (2018) and Policy 46 of the Draft Local Plan, all development will be required to protect the amenity and living conditions of new, existing and adjoining properties including consideration of noise and the impact of disturbance, traffic, servicing, parking, noise, light, vibration, overlooking, privacy and outlook.

Daylight Sunlight

- 5.33 Daylight sunlight modelling in accordance with the Building Research Establishment Guidelines ('BRE') has been undertaken by Development and Light to inform the massing of the proposed rooftop and extensions.
- 5.34 The findings and results of this assessment provided within the accompany report and the results for key adjoining residential properties are summarised as follows:
- Over 93% (170 out of 183) of windows assessed meet the typical BRE Guidelines recommendations for VSC; 92% (95 out of 103) rooms meet the typical BRE recommendations for NSL; and 97% (102 out of 105) of windows relevant for Sunlight assessment meet the typical BRE Guidelines for APSH. In the few areas where effects occur beyond the typical BRE parameters, these are either to a minor degree, as is common in urban environments, or relate to windows or rooms that are of a secondary nature.
 - Of the 13 windows that do not meet the VSC recommendations, eight are secondary windows in rooms where the primary window shows adherence to the BRE recommendations (and thereby

are not strictly relevant for consideration); the other five windows record minor effects (relative changes ranging from 20% to 29.9%).

- In terms of the NSL Daylight assessment, 92% of rooms assessed will meet the typical recommendations in the BRE. Four of the eight rooms that do not meet the recommendations record minor effects, while also demonstrating compliance with the VSC assessment. The other four rooms are small galley kitchens which are considered to be of a secondary habitable nature.
- In terms of the APSH Sunlight assessment, one of the three effects recorded as being beyond the typical recommendations is due to a restrictive design feature and would otherwise demonstrate adherence to the typical BRE recommendations. The other two effects relate to rooms that demonstrate compliance with the BRE recommendations when the overall Sunlight effect to the room is considered.
- All surrounding open spaces considered in relation to Overshadowing from the Proposed Development show adherence to the typical BRE recommendations.

5.35 Overall the Daylight & Sunlight effect of the Proposed Development on surrounding properties is considered to be minor; and the Overshadowing effect to surrounding open spaces is considered to be negligible.

Rooftop Plant

5.36 The proposals seek to replace existing mechanical equipment, with new plant and roof and ground. At roof level the plant would be located within the pitched roof form open only to the southern elevation, and at ground level external (or venting to/from external) building services plant on the southern façade is proposed.

5.37 The application is accompanied by a Noise Impact Assessment (NIA) prepared by Hoare Lea. The Assessment highlights that operational noise limits for buildings services plant, background noise levels and initial building services plant selections have been identified and assessed with reference to the nearest noise sensitive properties in Tersha Street, Cedar Terrace and West Sheen Vale.

5.38 Additional noise control mitigation for building services has been proposed which are incorporated in the design. The results from incorporation of the mitigation indicate the proposed design criteria and hence London Borough of Richmond upon Thames requirements can feasibly be satisfied as the design progresses. to nearest noise sensitive properties in Tersha Street, Cedar Terrace and West Sheen Vale.

Privacy and Overlooking

- 5.39 The additional windows at the northern elevation benefit from existing screening in the form of mature trees and are well separated from the residential properties to the north. Additional openings to the south and west replace existing openings. The proposals are therefore not expected to result in any further opportunities for overlooking to adjoining properties from within the building.
- 5.40 The emerging proposals also seek to provide new terrace spaces to floors two and three at the building's southern elevation, and the provision of a communal terrace space at third floor at the southern elevation.
- 5.41 The proposed terrace spaces are well setback from the residential properties located to the east, south and west of the Site. Each terrace would be appropriately screened to discourage overlooking to these properties, and appropriate management measures would be implemented to restrict their use to avoid disturbance to adjoining properties.
- 5.42 By virtue of these locational and design features, the terraces would be able to exist without causing any direct privacy, overlooking or noise related amenity issues.

Noise Management

- 5.43 The rear amenity terrace spaces have been designed in a way to minimise noise disturbance to neighbouring properties. In addition to this specific design measure, the potential impacts associated with noise shall also be dealt with via a number of management measures. A detailed Operational Management Plan for the roof terrace would need to be agreed through an appropriate condition, however, the following are broad commitments to the use of the terrace spaces:
- The roof terrace shall be used by the occupants of the proposed development during standard office hours Monday through Friday.
 - Approval is sought for use of the new roof terrace between the hours of 0800 and 2200 hours Monday to Friday and via other times by exception only.
 - Amplified music shall not be played from the terrace spaces.

Sustainability and Energy Efficiency

- 5.44 Built environment sustainability is incorporated within policy and regulation at a national and local level. The Climate Change Act 2008 and the National Planning Policy Framework set out national frameworks by which to mitigate climate change, achieve reductions in carbon dioxide emissions, and deliver development that is aligned with the presumption in favour of sustainable development.

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- 5.45 Policy LP20 of the Local Plan (2018) states that the Council will promote and encourage development to be full resilient to the future impacts of climate change, as minimise energy consumption in accordance with the cooling hierarchy. Policy LP22 requires new non-residential development over 100sqm to meet BREEAM Excellent standard and should achieve a 35% reduction in carbon dioxide emissions.
- 5.46 Policy 3 of the Draft Local Plan requires new non-residential development over 100sqm to achieve net-zero carbon with a minimum of 60% on-site reduction. Draft Policy 6 requires new non-residential development over 500sqm to meet BREEAM Nondomestic New Construction 'Outstanding' standard or equivalent.
- 5.47 The application is supported by an Energy and Sustainability Statement prepared by Hoare Lea. The Statement concludes that the proposed development will result in a highly efficient, low-carbon scheme. New, high efficiency servicing equipment and efficient façades will minimise the energy usage of the building. Using the Mayor's energy hierarchy, the strategy has been developed to ensure that the proposed development is efficient and economical.
- 5.48 A BREEAM pre-assessment assessment has been undertaken covering the New Build and Refurbishment areas of the development which confirms that an 'Excellent' rating targeted with an aspiration for 'Outstanding'. This is considered to be compliant with the adopted policy and therefore should be acceptable.
- 5.49 The application is also accompanied by a Whole Life Carbon and Circular Economy Statement, prepared by Hoare Lea. This highlights that the proposed development will follow best practice principles in design and construction with the overarching aim of reducing material usage, minimising waste, and embedding longevity, flexibility and adaptability.

Transport

- 5.50 Appendix 3 of the Local Plan (2018) and Draft Policy 38 of the Draft Local Plan reference the need to comply with the vehicular and cycle parking standards within the London Plan (2021). Policy 48 of the Draft Local Plan additionally notes that car-free development will be appropriate for sites with a PTAL of 3 or above and where disabled vehicular parking standards can be met.
- 5.51 The proposals are accompanied by a Transport Statement, prepared by Icen Projects, which provides details of the proposed development's compliance with the relevant transport policies. The conclusions of this Statement can be summarised as follows:

Car Parking

- 5.52 Given the sustainable location of the Site (classified as 'excellent' by TfL), the proposals seek to retain some of the existing car parking, but reduce the overall level. This means that the uplift in the floor area is provided as car free, in line with London Plan standards for a site with a PTAL of 6a, but that the provision of the existing is also reduced, in this case to make way for cycle parking.
- 5.53 It is proposed to retain 29 spaces out of the existing 33 spaces resulting in a 12% reduction in car parking spaces. Due to the increase in floorspace and reduction in parking, the parking ratio will reduce from 1 space per 93sqm to 1 per 140sqm. Given that London Plan standards permit up to 1 space per 100m² the proposed provision accords with this as up to 40 spaces could be provided.
- 5.54 The proposed reduction in car parking aligns with current strategic and development management policies set out in Richmond's Local Plan.

Cycle Parking and End of Journey Facilities

- 5.55 The existing cycle parking provision is limited, with cycle lockers located in the car park with capacity for ten bicycles. The proposals provide the opportunity for cycle provision to be increased to London Plan standards. It is proposed that cycle provision in accordance with London Plan standards is applied to the new and uplifted floor areas.
- 5.56 In total the Proposed Development would offer up to 66 long stay and 6 short stay cycle parking spaces, which is a significant improvement compared to the existing 10 spaces long stay spaces and in excess of the number required in the able. A plan showing the location of the cycle stores is provided below.
- 5.57 There are currently no dedicated end of journey facilities provided at the Site, with one shower located within the core space. The proposed development incorporates the development of dedicated internal end of journey facilities, with the provision of 6 showers and 66 lockers for use primarily by cyclists.
- 5.58 Overall, it is considered that the proposed cycle parking provision is appropriate for the Site and would result in a significant improvement on the existing scenario.

Trip Generation

- 5.59 The number of person trips to and from the Site is anticipated to increase marginally by 12 in the AM peak and 14 in the PM peak. This is likely to be split across increased cycle trips as a result of the provision of cycle parking and end of journey facilities, as well as walking and public transport.
- 5.60 This is considered to be a negligible increase within the context of the public transport, cycling, and walking infrastructure within this highly accessible location.

Air Quality

- 5.61 Policy LP10 of the Local Plan (2018) states that the Council promotes good air quality and new technologies. Developers should secure at least 'Emissions Neutral' development. Richmond Council also recently adopted an Air Quality SPD (2020), which applies to all developments that introduce new exposure into areas of poor air quality.
- 5.62 The site is within an Air Quality Focus Area as identified in Appendix C of the SPD. The SPD notes that all developments proposed in or adjacent to these areas must play their part in ensuring that air quality in these areas does not worsen and must contribute towards an overall improvement in air quality.
- 5.63 The application is accompanied by an Air Quality Assessment, prepared by Air Quality Consultants, the findings of which can be summarised as follows:
- The Proposed Development will reduce the existing amount of car-parking provision by four spaces and therefore the amount of daily traffic associated with the Proposed Development will decrease.
 - The proposals involve the removal of the existing boilers and mechanical plant equipment, replacing them with Air Source Heat Pumps and installation of solar photovoltaic panels to ensure fully electric provision of energy and heating.
 - There will be no significant operational effects at any existing, sensitive receptor; a slight beneficial, but not significant, impact is anticipated.
 - During the construction works, a range of best practice mitigation measures will be implemented to reduce dust emissions and the overall effect will be 'not significant'; appropriate measures have been set out in this report, to be included in the Dust Management Plan for the works.
 - Overall, the construction and operational air quality effects of the Proposed Development are judged to be 'not significant'.
- 5.64 It can therefore be concluded that the proposed development has been shown to meet the London Plan's – and SPD – requirements that new developments are at least 'air quality neutral'. Please refer to the submitted Air Quality Assessment for additional information.

Accessibility

- 5.65 Policy LP30 of the Local Plan (2018) states that the Council will support developments that result in facilities that encourage an inclusive development layout and public realm which considers the needs of all. Policy LP1 also aims to ensure that development respects, contributes to and enhances the local environment, accommodating inclusive design.
- 5.66 Policy 28 of the Draft Local Plan aims to ensure the developments achieve the highest standards of accessible and inclusive design, in accordance with London Plan Policy D5. Draft Strategic Policy 51 outlines that an Inclusive Design Statement will be required as part of the Design and Access Statement, in support of new development, and that this should be proportionate to the scale and type of development.
- 5.67 The existing building benefits from level access which would be retained as part of the development proposal. This would ensure that the entrance to the building remains accessible and inclusive. All areas of the building, including the proposed roof terraces and external amenity space would be fully accessible and capable of accommodating the needs of more a variety of users, with differing needs.

Fire Safety

- 5.68 A Fire Safety Statement has been prepared by Hoare Lea to accompany the proposed development. The statement has been prepared to outline the approach and provisions relating to fire safety for the Proposal to achieve compliance with London Plan (2021) Policy D5 and D12.
- 5.69 The Statement confirms that the proposals have been designed to achieve the relevant fire safety requirements of Policies D12 and D5. The fire strategy would be further developed for submission to the Approving Authority at the appropriate time and would meet the functional requirements of the Building Regulations relevant to fire safety, taking recommendations from the requirements of Policy D5 and D12 of The London Plan, where possible.

Delivery and Servicing, and Refuse Collection

- 5.70 Policy LP45 of the Local Plan (2018) states that applications should be accompanied by a Delivery and Servicing Plan which highlight that the development will create no sever impacts on the efficient and safe operation of the road network and no material harm to the living conditions of nearby residents.
- 5.71 The accompanying Delivery and Servicing Plan, prepared by Iceni Projects, highlights that there are no anticipated changes to the number of trips caused by the small uplift in office space. It therefore follows that, for the delivery and servicing trip generation, the number of office deliveries is also anticipated to be the same with the servicing area able to accommodate the trips in the same way.

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- 5.72 The frequency and location of refuse collection at the Site will also remain the same as existing. As such, there are not anticipated to be any issues arising from the safe operation of the Site for deliveries, servicing or refuse collection.

Construction Management

- 5.73 An Outline Construction Traffic Management Plan has been prepared by Iceni Projects to accompany the application. The plan includes a high-level overview of the construction traffic and pedestrian impacts and management works associated with the development. The plan identifies impacts associated with the construction on the local traffic network and outlines potential solutions or mitigating methods which will be implemented during the construction phase of the development.

Ecology

- 5.74 The proposal is accompanied by a Preliminary Ecological Appraisal and Roost Assessment (PEAPRA), prepared by Arbtech. This highlights that, at present, the Site has limited ecological value, with the majority of the Site comprising hardstanding and less than 10% of the area covered by vegetation.
- 5.75 The Report has confirmed that there are no habitats on the site which could be used by bats for foraging. However, bats could pass when dispersing from nearby roosts outside of the Site. It was therefore recommended that habitat creation and enhancement opportunities could be incorporated into the proposed development: Planting of native shrubs and trees in the redeveloped car park to create foraging and sheltering opportunities for wildlife. These will be considered as part of the detailed landscaping strategy to be provided at detailed design stage through an appropriately worded condition.

Planning Obligations (CIL / S278)

Community Infrastructure Levy

- 5.76 The proposals would result in over 100sqm of new build development, and therefore the application is liable for the payment of CIL. It is noted that the Council do not currently charge CIL for office development outside Richmond Town Centre. However, the scheme would be liable to pay Mayoral CIL 2 in line with the relevant charging schedule.
- 5.77 Richmond's Planning Obligations SPD (2020) sets out the Council's approach to securing planning obligations through Section 106 agreements.
- 5.78 In terms of site-specific planning obligations, it is noted that Policy LP 26 of the Local Plan (2018) and draft Policy 50 of the Draft Local Plan requires a Local Employment Agreement to be secured through a Section 106 agreement if the construction phase would create more than 20 FTE jobs.

The Applicant would welcome further discussions with the Council in relation to this obligation as the application progresses.

5.79 The Applicant shall work with the Council during the assessment of the application to as part of agreeing the Section 106 obligations.

6. PLANNING BALANCE AND CONCLUSION

- 6.1 This planning application has been prepared on behalf of Stagecoach Pension Trustee Company Ltd & The Stagecoach Pension Trustee Company (No.2) Ltd c/o Barings Real Estate for support of a planning application for full planning permission for development at Avalon House, 72 Lower Mortlake Road, Richmond, TW9 2JY.
- 6.2 The proposals would provide significant positive economic, social and environmental benefits, as demonstrated in this report.
- 6.3 The proposed development has sought to achieve the following principal development objectives:
- The scheme is fully aligned with the Economic, Social and Environmental pillars of the NPPF.
 - Taking a retrofit approach through retaining, extending and optimising the existing building to enhance its employment generating capacity as a prime commercial asset within a highly accessible, edge of centre location.
 - Appropriately responding to the massing and built form of the Site and its immediate context.
 - Improve the efficiency and legibility of the existing building entrance such that it presents a more active and permeable relationship with the street scene.
 - Enhancing the visual quality of the building's primary façade to Lower Mortlake Road.
 - Extension levels are to be treated in a viroc cement panel facade system, which is more in keeping with roof materiality of the street, creating a more subtle palate.
 - Maintain the existing levels of amenity enjoyed by neighbouring properties in relation to daylight and sunlight, overlooking and privacy, and noise.
 - Improving the amenity and staff wellness of future occupants of the Site through the provision of terraced amenity spaces and external planting, provision of end of dedicated journey facilities, and enhancing the daylight and natural ventilation levels within the commercial floorplates.
 - Improve the energy and resource efficiency of the building.
- 6.4 Paragraph 11 of the NPPF applies the presumption in favour of sustainable development and requires decision makers to consider whether relevant development plan policies are up to date. Decision taking is identified in Part (c) and (d) of Paragraph 11, which states:

c) approving development proposal that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁸, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed⁷; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework as a whole.

- 6.5 As the preceding planning analysis demonstrates, the scheme accords with both local and national policy, whilst providing numerous economic, social and environmental benefits that weigh in support of the scheme being granted planning permission. Therefore, the proposals should be approved without delay in accordance with Paragraph 11(c) of the NPPF.
- 6.6 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 6.7 A comprehensive assessment of the proposed development against the development plan policies has been undertaken. It is apparent that there are no technical constraints or barriers that would prevent the development from coming forward, and that the proposed development accords with National and Local Planning Policy. Accordingly, planning permission is sought for the proposal.