


GREATER **LONDON** AUTHORITY


GVA
65 Gresham Street
London
EC2V 7NQ

Department: Planning
Your reference:
Our reference: GLA/4795/LB
Date: 8 November 2018

Dear 

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

Site: Homebase, Manor Road
LPA: London Borough of Richmond
Our reference: GLA/4795

Further to the pre-planning application meeting held on 10 October 2018, I enclose a copy of the GLA's assessment which sets out our advice and matters which will need to be fully addressed before the application is submitted to the local planning authority.

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

Yours sincerely


John Finlayson
Head of Development Management

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

8 November 2018

Homebase Site, Manor Road

In the London Borough of Richmond-upon-Thames

The proposal

Redevelopment of the site to provide a residential led scheme comprising 381 units, commercial floorspace and new public realm.

The applicant

The applicants are **Avanton** and the architect is **Assael**.

Context

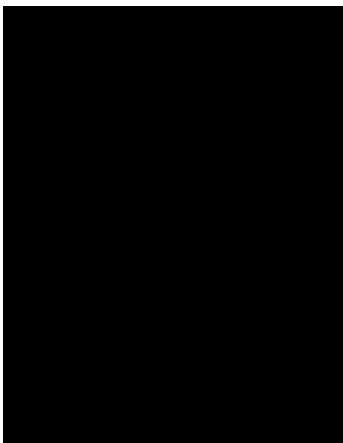
1 On 10 October 2018 a pre-planning application meeting to discuss the above proposal for the above site was held at City Hall, with the following attendees:

GLA Group



Senior Strategic Planner - Case Officer
Team Leader
Senior Strategic Planner - Urban Design
Planning, TfL

Applicant



ICG Longbow
ICG Longbow
Avanton
Avanton
Assael Architects
Assael Architects
Assael Architects
Gillespies Landscape
Sanderson Associates Highways
Hoare Lea Energy and Sustainability
GVA Planning
GVA Planning

LPA



London Borough of Richmond-upon-Thames - Case Officer

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Site description

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

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

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

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

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

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

Details of the proposal

9 The scheme proposes redevelopment of the site to provide a residential led scheme of 381 residential units (the applicant intends to include 35% affordable housing subject to viability) and 522 sq.m. of flexible commercial floorspace at ground floor facing a new public square with a retail kiosk. The proposed buildings range from four to seven storeys in height and include associated cycle parking, car parking, playspace, landscaping and public realm improvements.

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

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

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

Strategic planning issues and relevant policies and guidance

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

13 The following are relevant material considerations:

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

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

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

Summary of meeting discussion

15 Following a presentation of the proposed scheme from the applicant team, the meeting discussions covered strategic issues with respect to the following: principle of development; housing and affordable housing; urban design; inclusive access; transport; climate change; and flood risk, drainage and water. GLA officer advice in respect of these issues is set out within the sections that follow.

Principle of development

16 London Plan Policy 3.3 and draft London Plan Policy H1 seek to increase the supply of housing in the capital. Policy H1 specifically identifies car parks and low-density retail parks as a source of capacity for housing delivery. Richmond are not seeking to retain a large quantum of retail in this location. There is no objection to the loss of the retail use, which is not located in a designated town centre.

17 The proposals would provide 381 homes, which equates to 121% of Richmond's annual monitoring target of 315 in the London Plan (and 47% of the annual monitoring target of 811 set out in the draft London Plan). The principle of the proposed residential use on this accessible, previously developed site is strongly supported, subject to addressing the issues raised within this report.

18 The proposals include 522 sq.m. of commercial floorspace. The applicant has not confirmed the specific use classes but indicated this could include retail, office or community space. Given the existing context, the provision of small-scale supporting commercial uses to contribute to a sense of place is supported.

Affordable Housing

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

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

21 On the date of this report, the applicant has not submitted any information on the proposed affordable housing provision as part of this request for pre-application advice.

22 If a 35% affordable housing by habitable room offering is made by the applicant in accordance with the Mayor's Affordable Housing and Viability SPG and the draft London Plan the scheme would qualify for the Fast Track Route. In addition, the affordability of the units must accord with the requirements of Policy H7 of the draft London Plan, the Mayor's Affordable Housing and Viability SPG and the London Plan Annual Monitoring Report 14 for 2017/18. Details of the proposed social and intermediate rents must therefore be submitted, and the applicant should note that London Affordable Rent and London Living Rent are the Mayor's preferred affordable housing tenures.

23 The applicant should investigate Mayoral grant funding opportunities as part of this process. If the application cannot be assessed under the Fast Track route, a financial viability assessment will be required.

24 In any application, the applicant must provide full details of the tenure mix, details of any rent levels and any income thresholds. In addition, the applicant must confirm whether they have attempted to increase the affordable housing offer through accessing grant.

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

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

Housing mix

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

Residential quality

28 London Plan Policy 3.5 and Policy D4 of the draft London Plan promote quality in new housing provision, with further guidance provided in the Housing SPG. The scheme should continue to be designed to meet and exceed London Plan and draft London Plan minimum residential space standards.

Children's play space

29 Policy 3.6 of the London Plan and Policy S4 of the draft London Plan, seeks to ensure that development proposals include suitable provision for play and recreation. Further detail is provided in the Mayor's supplementary planning guidance (SPG) 'Shaping Neighbourhoods: Play and Informal Recreation', which sets a benchmark of 10 sq.m. of useable child play space to be provided per child, with under-fives play space provided on-site as a minimum. Further details demonstrating full compliance should be provided in any application brought forward.

Urban design

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

31 Provision of a public square is welcomed but its size and the uses that flank it should be considered further.

32 The arrangement of blocks has potential to create clear distinction between public and private realm but the openings to courtyard spaces risks detracting from this and needs careful consideration.

33 The green spaces between the two southern blocks and railway need to be fully resolved, avoiding any 'left over' spaces or poorly overlooked areas that could encourage anti-social behaviour.

34 The spaces at the base of the 'jewel' building are poorly defined at present and would benefit from further refinement, ensuring blue badge parking is fully incorporated into the landscaping strategy.

35 The applicant should explore relocating the 'pavilion' building into the base of the 'jewel' building. This would create potential for a community focussed destination/landmark and would open up the square.

36 The inclusion of ground floor duplexes is welcomed and will help to activate the main street frontage. The applicant should explore locating additional duplex units along the railway edge of the south eastern block to create a 'mews' type environment and encourage passive surveillance along this edge. This would also reduce the amount of single aspect units facing onto the railway

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

38 The inclusion of ‘through units’ to maximise the proportion of dual aspect across the scheme is welcomed, however, they appear very narrow and deep.

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

40 The heights and massing strategy responds positively to the existing low-rise context, with the scale dropping down to respect neighbouring properties along the south and eastern edges. Given the high accessibility of the site, there is scope for additional height and this should be fully explored, in particular, there is strong potential to increase the height of the ‘jewel’ building. Options should be tested in local townscape views in tandem with daylight/sunlight analysis.

41 A taller building would be beneficial in terms of landmarking the proposed public square and would also improve on the building’s proportions which appear squat at present.

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

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

Inclusive access

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

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

Climate change

46 The energy assessment planning guidance is available on the GLA website (October 2018). This provides further information on the revised targets to take into account Part L 2013 of the Building Regulations. It also provides details on the information that should be submitted within the energy statement to be submitted at stage 1. See link for the latest guidance published in October 2018 <https://www.london.gov.uk/WHAT-WE-DO/PLANNING/PLANNING-APPLICATIONS-AND-DECISIONS/PRE-PLANNING-APPLICATION-MEETING-SERVICE-0>

47 The following targets are now in effect, as set out in the revised energy assessment guidance:

- Residential developments – Zero carbon (as defined in section 5.2 of the Housing SPG) against Part L 2013
- Commercial/Non-domestic – 35% below Part L 2013

48 The carbon emission figures should be reported against a Part L 2013 baseline. The March 2016 guidance provides details on presenting carbon emission information separately for domestic

and non-domestic elements of the development in light of the zero carbon target for domestic developments. The baseline, as per the GLA guidance, should be modelled assuming gas boiler systems for heating purposes.

49 The applicant should commit to meeting Part L 2013 by efficiency measures alone for both domestic and non-domestic elements separately. Sample SAP full calculation worksheets (both DER and TER sheets) and BRUKL sheets including efficiency measures alone should be provided to support the savings claimed.

50 Evidence will be provided on how the demand for cooling and the overheating risk will be minimised through passive design in line with Policy 5.9. The applicant should particularly consider how best to mitigate any restrictions posed by, for example, local air quality or noise issues, ground floor apartments and single aspect units. Dynamic overheating modelling in line with CIBSE Guidance TM59 for all TM49 weather files will be carried out and this is welcomed.

51 An area weighted average for the actual and notional cooling demand should be provided and the applicant should demonstrate that the actual building's cooling demand is lower than the notional (MJ/m²).

52 A domestic overheating checklist is included in the GLA's energy guidance which should be completed and used to identify potential overheating risk and passive responses early in the design process. The completed checklist should be included in the appendix of the energy statement.

53 No proposed or existing district heating networks are currently available. The site should be future proofed for connection to a potential network and the means in place to futureproof the site should be outlined.

54 In light of the policy and grid related changes, the applicant is proposing an ASHP solution for heating purposes. This is supported however further information on the heat pump operation should be provided to establish the technology's performance:

55 An estimate of the heating and/or cooling energy the ASHP would provide to the development and the electricity the heat pump would require for this purpose

56 Details of the Seasonal Coefficient of Performance (SCOP) and Seasonal Energy Efficiency ratio (SEER), which should be used in the energy modelling. This should be based on a dynamic calculation of the system boundaries over the course of a year i.e. incorporating variations in source temperatures and the design sink temperatures (for space heat and hot water). Details of the assumptions should be included in the energy assessment, including manufacturer datasheets showing performance under test conditions for the specific source and sink temperatures of the proposed development and assumptions for hours spent under changing source temperatures.

57 Confirmation is required as to whether any additional technology is required for hot water top up and how this has been incorporated into the energy modelling assumption, as is an estimate of the expected heating costs to occupants, demonstrating that the costs have been minimised through energy efficient design.

58 Confirmation is required that end-users will be supplied with regular information to control and operate the system e.g. at point of occupancy and maintenance visits, along with the expected heat source temperature and the heat distribution system temperature with an explanation of how the difference will be minimised to ensure the system runs efficiently. The applicant should confirm the proposed approach to generating domestic hot water and the integration of thermal storage.

59 A commitment should be made to monitor the performance of the heat pump system post-construction to ensure it is achieving the expected performance approved during planning.

60 The applicant has stated that a building-by-building approach is being proposed. This is not considered acceptable and the site should be served by a single energy centre. The applicant should also commit to providing a site wide heating network where all uses and buildings on site will be connected to. A drawing/schematic indicating that all buildings are connected to the sitewide network should be provided. A plan showing the size, internal layout and proposed location of the energy centre should be provided.

61 In line with Policy 5.7 the applicant should investigate the inclusion of all other on-site renewable energy generation technologies. Solar technologies are proposed; a detailed plan showing the proposed location of the installation should be provided. The applicant should additionally demonstrate that the site's full potential for a solar PV installation has been maximised.

Flood Risk, Drainage and Water

Flood Risk

62 The site is greater than 1 hectare in area. Under the NPPF, a Flood Risk Assessment (FRA) will need to accompany the application.

63 Environment Agency mapping shows parts of the site to be at high risk of flooding from surface water. Other forms of flooding may also present a risk. The FRA should assess all sources of flood risk in relation to London Plan Policy 5.12 and draft London Plan policy SI12.

64 Where the site is found to be at medium or high risk of flooding from at least one source the FRA should also consider the need for flood resilience and emergency planning measures.

Sustainable Drainage

65 The drainage strategy should aim to reduce surface water discharge from the site to greenfield rates in accordance with London Plan Policy 5.13 and draft London Plan policy SI13. This is particularly important given the surface water flood risk in the area. Where greenfield runoff rates are not feasible and robust justification is provided, a discharge rate of three times greenfield rate may be acceptable.

66 The drainage strategy should maximise opportunities to use Sustainable Drainage System (SuDS) measures at the top of the drainage hierarchy set out in London Plan Policy 5.13 and draft London Plan policy SI13. Roofs and new public realm areas present an opportunity to integrate SuDS such as green and blue roofs, tree pits, and permeable paving into the landscape, providing amenity and water quality benefits.

Water Efficiency

67 The residential components of the development should achieve a water consumption of less than 105l/person/day, in line with London Plan policy 5.15 and draft London Plan policy SI5.

68 The non-residential components of the development should achieve the equivalent of an 'Excellent' rating on the water elements of BREEAM, in line with draft London Plan policy SI5.

69 Water reuse should be considered for inclusion in the development to meet both water efficiency and sustainable drainage requirements.

Transport

70 A robust transport assessment should be submitted with the planning application in accordance with TfL's Transport Assessment Best Practice Guidance: <https://www.tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guidance>

71 This should contain a multi-modal trip generation assessment and depending on the likely development impact. Mitigation measures / contributions to maintain or enhance the surrounding transport network may be required as a result. The TRICS database will be used to determine total person trips for the proposed development uses. Only London survey sites should be used for the calculations.

72 There will be no direct vehicular access to the site from the Transport for London Road Network. It is proposed to maintain the existing site vehicular access and the applicant should demonstrate that the development will not impact on the operation of the existing bus terminus.

73 The development will be car free, which is welcomed. The applicant should explore reducing the 25 spaces reserved for disabled users to bring the provision in line with draft London Plan standards. Electric Vehicle Charging Points (EVCP) including passive provision are welcomed.

74 Cycle parking provision should be in line with draft London Plan standards. Cycle stores should be broken up into smaller areas for added security. Short-stay cycle parking should be located in close proximity to building entrances of all buildings to provide convenience and choice for all users.

75 The applicant should ensure that the Healthy Streets approach is considered both throughout the site and within the local area, including pedestrian and cycle routes to all transport nodes. Travel planning, and servicing and construction management will all need to be covered in the transport assessment.

76 Mayoral CIL is payable at a rate of £50 per square metre in the London Borough of Richmond upon Thames.

77 Any mitigation measures relating to TfL infrastructure and services must be secured through the s106 agreement, it may be appropriate for TfL to be a signatory in order to receive financial contributions and obligations relating to transport.

Conclusion

78 The proposed redevelopment of the site to provide a residential-led scheme comprising 381 units and 522 sq.m. commercial floorspace is supported in principle and the scale and massing is appropriate, with scope for additional height. Issues relating to affordable housing; urban design; inclusive access; climate change; flood risk, drainage and water; and transport must also be addressed in order to make the proposals compliant with the London Plan and draft London Plan.

for further information contact GLA Planning Unit:

██████████, **Team Leader**

██████████ @london.gov.uk

██████████, **Senior Strategic Planner (case officer)**

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21 January 2019

Homebase Site, Manor Road

In the London Borough of Richmond-upon-Thames

The proposal

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

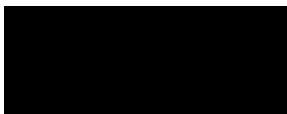
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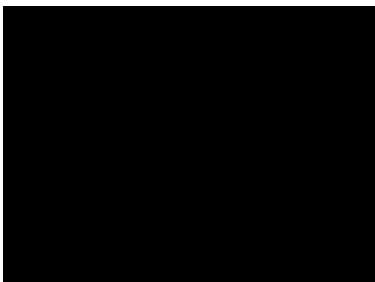
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4 Currently the site comprises of a large, low density retail unit with a large amount of surface level car parking. To the east of the site is an additional low density retail unit which is currently occupied by a Sainsbury's store.

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

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

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

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

Details of the proposal

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

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

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

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

Strategic planning issues and relevant policies and guidance

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13 The following are relevant material considerations:

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- Climate change *London Plan; Sustainable Design and Construction SPG; London Environment Strategy.*
- Transport *London Plan; the Mayor's Transport Strategy; Land for Industry and Transport SPG.*
- Water *London Plan; London Environment Strategy.*

Case history

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

Summary of meeting discussion

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

Principle of development

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

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

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

Affordable housing

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

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

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

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

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

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

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

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

Housing mix

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

Table one: proposed unit mix

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

Residential quality

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

Children's play space

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

Urban design

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

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

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

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

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

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

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

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

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

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

Inclusive access

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

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

Conclusion

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

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

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