

23 December 2021

Richard Green
Manor Road
The Planning Team
Greater London Authority
City Hall
Kamal Churchie Way
London
E16 1ZE
Planning

Dear Richard Green

**Re: 84 MANOR ROAD
HOMEBASE MANOR ROAD
PUBLIC CONSULTATION ON AMENDED APPLICATION
LOCAL AUTHORITY REF: 19/0510/FUL / GLA REF: 4795**

Introduction

In **February 2019**, a planning application (ref: 19/0510/FUL) was submitted to the London Borough of Richmond for the redevelopment of Homebase, Manor Road (2019 scheme). The scheme proposed:

Demolition of existing buildings and structures and comprehensive residential-led Redevelopment of a single storey pavilion, basements and four buildings of between four and nine storeys to provide 385 residential units (Class C3), flexible retail /community / office uses (Classes A1, A2, A3, D2, B1), provision of car parking spaces and cycle storage facilities, landscaping, public and private open spaces and all other necessary enabling works.

On **3 July 2019**, the London Borough of Richmond's Planning Committee resolved to refuse the above application on six grounds (Refer to Appendix 1 for the Committee Report and Minutes):

- Affordable housing
- Design
- Residential amenity
- Living Standards
- Energy
- Absence of legal agreement to secure necessary Heads of Terms.

On **29 July 2019**, the Mayor notified the Council that he would act as the local planning authority (LPA) for the purposes of determining the planning application (under article 7 of the Mayor of London Order and the powers conferred by Section 2A of the 1990 Town and Country Planning Act).

Subsequent to the Mayor's direction, the Applicant submitted revisions in **November 2019**, and then again in **July 2020**. The July 2020 scheme (2020 scheme) proposed

Demolition of existing buildings and structures and comprehensive phased residential-led redevelopment to provide 453 residential units (of which 173 units will be affordable), flexible retail, community and office uses, provision of car and cycle

parking, landscaping, public and private open spaces and all other necessary enabling works.

The key differences between the 2019 scheme submitted to LB Richmond and the 2020 scheme submitted to the GLA were (and illustrated in the tables and images below):

- Removal of Building E which was part of the revisions made on 22 November 2019.
- Increase in residential units from 385 to 453
- Increase in heights (from 4-9 to 4-11)
- Reduction of basement and relocation of cycle and bin storage to ground floor of Blocks
- Increase in cycle parking.
- Design amendments including additional cores, dual aspect units, less north facing units, increased overlooking distances and improvements to residential amenity spaces.
- Rearrangement of commercial floorspace
- Alterations to building elevations and detailed design
- Public realm amendments
- Amendments to the site-wide Energy Strategy
- Increased provision of affordable housing from 35% (134 units) to 40% (173 units) (with grant funding) by habitable room and amendments to tenure split from 30/70% affordable rent / intermediate to 52/48%.

On **3 September 2020**, the Council submitted representations on the above scheme (September 2020) (Appendix 2), raising the following objections:

1. Affordable Housing:
 - a. Failure to meet 50% on site provision (LP 36).
 - b. Failure to comply with Mayoral or Richmond policy on affordable housing mix (thus not compliant with the Fast Track approach).
 - c. Lack of viability information to demonstrate the maximum reasonable provision of affordable housing is being delivered.
 - d. Further modelling required to confirm that the overall number and proposed affordable mix provides the optimum level and tenure mix of affordable homes and, given the Council's priority need is for family accommodation, whether adjustments to the tenure mix could bring about an increase in family homes.
 - e. Lack of Wheelchair accessible homes across all tenures.
 - f. Failure to comply with the Borough's affordability criteria for the shared ownership and the London Living Rent homes being more than 90% of market rent.
 - g. Outstanding S106 matters – Quantum; Tenure; Mix; Affordability; Phasing; Delivery; Review mechanisms; Service charges; Marketing; Use of grants for uplift; Wheelchair design and provision.
2. Design and Height:
 - a. Reasons for refusal set out in the Committee Report not overcome.
 - b. Height: Previous objections remain, in particular the relationship with the surrounding domestic suburban townscape (Manor Road; Trinity Road, Dee Road)
 - c. Design and materials: Top floor of Blocks A, C and D appears 'heavy' and further refinements needed to the choice of materials.
3. Residential Amenity:
 - a. Objections and reason for refusal previously made remain valid.
 - b. Impact on the residential amenity of those in Manor Park and Calvert Court as a result of Block C and D – overbearing, visually intrusive and overlooking.
 - c. Impact Block B on those residents to the west of the site (in combination with Block C and Block D).
 - d. Concerns remain over the impact on Cliveden House.
 - e. Lack of information on light – whether the proposed relationship is reflective of the surrounding context.
4. Living standards:

- a. Overlooking and levels of light
 - b. Separation between units within Block C
 - c. Single aspect units of Block B facing Block D
5. Playspace:
- a. Further details required – provision, design and operation policy
 - b. On-site requirements for U11s are not being met
 - c. Contribution to offset uplift at local park
6. Transport:
- a. Necessary amendments: Waste and servicing details; Increase in refuse and recycling storage and clarity on future provision of disabled bays
 - b. Necessary Heads of Terms: Highway works required to pedestrian refuge; CPZ contribution; Removal of car parking permits; Various financial contributions; S38 and S278 works; Contribution towards uplift in servicing
7. Ecology: Urban Greening Factor requirements not met
8. Trees: Concerns over suitability of street planting and further details should be conditioned
9. Air quality and noise: Requirements of the recently adopted Air Quality SPD should be met
10. Education: Increased education need
11. Health: A financial contribution of £193,500, is required towards primary healthcare
12. Energy: Offset contribution required

On **1 October 2020**, a Representation Hearing was held online, where the Mayor decided to grant permission for the 2020 scheme, subject to the completion of a S106 agreement. (The Hearing Report and Addendum can be found in Appendix 3 and 4 respectively).

Notwithstanding the outcome of the October 2020 Hearing, no decision has been issued.

On **17 November 2021** the applicant submitted further revisions to the GLA (2021 scheme), where it is reported are a response to:

- Changes in the local bus network and the adoption of the London Plan 2021 since the Mayor considered the Application at the Representation Hearing on 1 October 2020
- Errors in the site boundary (and corresponding ownership)

These amendments include:

- a. Realignment of the red line boundary line to reflect the site ownership (Image 1), resulting in:
 1. Reduction in site area (768.7sqm - from 18,416m² to 17,647m²) – however, no change to the built area of the site
 2. Relocation of the proposed car club spaces (Image 2)
 3. Accessible parking bays moved as a result of shift in car club bays (Image 3)
 4. Relocation of the refuse holding area (Image 2)
 5. Courtyard design reconfigured to make up for loss of play space as a result of shift of refuse holding area
 6. Amendments to landscape layout at South East corner as a result of change in red line
- b. Amendments to the affordable housing:
 - i. Revisions to the tenure split, with an increase in London Affordable Rent (LAR) units (+18 LAR units (43 habitable rooms)) with a corresponding decrease in intermediate affordable housing (London Living Rent).
 - ii. Revised Area and Accommodation schedule
- c. Revisions to the following documents:
 - i. Application Form
 - ii. CIL form

- iii. Certificates
- iv. Design and Access Architectural Addendum
- v. Landscaping Addendum
- vi. Construction Environmental Management Plan
- vii. Planning Statement
- viii. Digital Connectivity Note
- ix. Revised Waste Management Strategy Addendum
- x. An updated Transport Assessment and Travel Plan
- xi. Changes to the application site boundary

Image 1: Changes to boundary line
July 2020 scheme (blue line)
November 2021 scheme (red line)

- Pulling away from network rail fence along the western and southern boundaries (1)
- Changes around the pedestrian staircase at the level crossing with Manor Road (2)
- Slight alteration to the northern edge of the site (3)



Image 2: Relocation of the car club bays and refuse holding area

Blue (1) – car club bay
Red (2) – refuse holding area

The car club bays and refuse holding area were proposed perpendicular to the northwest boundary (left image), and have since been relocated adjacent to the concierge at the base of Block B (right image).



The July 2020 scheme incorporated 2 car club bays running perpendicular to the northwest boundary. Due to the changes to the site boundary, the parking layout has been amended, with the car club bays relocated adjacent to the concierge at the base of Block B. Two further spaces have been created to the west of Block C, resulting in loss of landscaping, as shown in Image 3 on the comparison plan extracts below:

Image 3: Relocated accessible parking bays (2020 scheme on the left and 2021 scheme on the right)



Legislation, National Planning Policy Framework, & other material considerations:

Legislation:

S70(2) of the Town and Country Planning Act 1990 states, “In dealing with an application for planning permission... the authority shall have regard to—

- (a) the provisions of the development plan, so far as material to the application,
- (b) any local finance considerations, so far as material to the application, and
- (c) any other material considerations”.

The Planning and Compulsory Purchase Act 2004 states:

S38(6), *“If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise”*

S38(2), *“For the purposes of any area in Greater London the development plan is—*

- (a) the spatial development strategy,*
- (b) the development plan documents (taken as a whole) which have been adopted or approved in relation to that area, and,*
- (c) the neighbourhood development plans which have been made in relation to that area”.*

National Policy

The National Planning Policy Framework (Framework) sets out the government's planning policy for England and how these are expected to be applied, and therefore forms part of the Development Plan. The Framework is a material consideration in planning decisions.

Material Planning Considerations:

A material planning consideration is one which is relevant to making the planning decision in question, and as set out in the National Planning Policy Guidance (NPPG):

“the planning history of a site may be a relevant consideration in the determination of an application”...“it is for the decision maker to decide what weight is to be given to the material considerations in each case”.

Whilst the Mayor's resolution to approve the application in October 2020 is a material planning consideration, a decision has never been issued and since the Representation Hearing, there has been a change to the development plan and consequently planning policy (with the update of the Framework in July 2021 and the adoption of the London Plan in March 2021). Therefore, the Mayor's decision should be only given limited weight.

The application should be determined in accordance with the Framework, London Plan 2021, the London Borough of Richmond Local Plan 2018, unless material considerations indicate otherwise.

As of 10 December 2021, consultation started on the Council's Pre-Publication (Regulation 18) Draft Local Plan. As part of this, a new Site Allocation 28 is proposed for the Homebase site. This is for a residential-led development and is intended to reflect the proposed redevelopment. In accordance with paragraph 48 of the NPPF as it is at an early stage in plan preparation and the extent of unresolved objections are not yet known; this Draft Plan is not yet adopted for Development Management purposes. However, an Urban Design Study 2021 has been undertaken and published to inform the draft Local Plan, as part of the evidence base and this is a material planning consideration.

Land use:

Commercial – September 2020 comments remain valid – no objection

Housing

Unit mix: Whilst the mix within the LLR and LAR tenures has altered slightly (Refer to Table 1), there is no change to the site wide totals or private and shared ownership mix, and no objections are raised.

Table 1: Unit mix

Unit Size	Private Market Sale		London Shared Ownership		London Living Rent		London Affordable Rent		Total	
	Oct 20 Hearing	Current	Oct 20 Hearing	Current	Oct 20 Hearing	Current	Oct 20 Hearing	Current	Oct 20 Hearing	Current
Studio	30	30	0	0	0	0	0	0	30	30
1-bed	86	86	1	1	36	25	20	31	143	143
2-bed	145	145	33	33	19	11	49	57	246	246
3-bed	19	19	0	0	0	0	15	15	34	34
Total	280	280	34	34	55	36	84	103	453	453

Wheelchair housing: To ensure suitable housing and genuine choice of London's diverse population, policy D7 of the London Plan requires all residential developments to include at least 10% of dwellings to meet M4(3) wheelchair user dwellings, with the remaining to meet M4(2) accessible and adaptable dwellings. Further *"the requirement for M4(3) wheelchair user dwellings applies to all tenures"*. (para. 3.7.3)

The scheme proposes 46 M4(3) units, thereby meeting the 10% requirement, however, these are only split between the private (29) and LAR (17) units, thereby not spread across all tenures. The failure to provide any M4(3) units within the intermediate housing stock fails to meet the policy requirement of D7 to provide choice to all London's population.

Affordable housing

Policy H6 of the London Plan sets a strategic target for 50% of all new homes to be genuinely affordable, with the following splits between affordable housing products:

- A minimum of 30% London Affordable Rent (LAR) or Social Rent
- A minimum of 30% intermediate products, including London Living Rent (LLR) and London Shared Ownership
- The remaining 40% to be determined by the borough (in this case, 32% low cost rented homes and 8% intermediate products)

Therefore, to accord with policy H6, the affordable housing provision should include:

- 62% London Affordable Rent or Social Rent
- 38% intermediate products

To meet the Fast-Track Route, the tenure of 35% of homes must meet the above tenure splits.

The November 2021 scheme retains the overall number of affordable homes, however, proposes a revised affordable offer, with the conversion of LLR Intermediate units to LAR units (as summarised in Tables 2 and 3):

- Reduction in number of Intermediate units (all LLR) – 1 and 2 bed units (19 units)
- Increase in number of London Affordable Rent – 1 and 2 bed units (19 units)

The revised tenure split meets the necessary split identified in policy H6, with 40% affordable housing by habitable room in total with a tenure split of 70:30 (LAR:INT) for the first 35%, with the 40% overall being met through additional shared ownership homes. The uplift in the number of London Affordable Rent homes (11 x 1bed, 5 x 2 bed 3 person and 2 x 2 bed 4 person flats) in Block C is a welcome improvement which is strongly supported.

Table 2 identifies the proposed affordable housing mix

	July 2020	November 2021	Difference
Affordable housing by units	173 units	173 units	-----
% of affordable housing by hab rms	40.1%	40.1%	-----
Shared ownership	34 units 101 hab rms	34 units 101 hab rms	-----
London Living Rent	55 units 129 hab rms	36 units 83 hab rms	-19 units -46 hab rms
London Affordable rent	84 units 247 hab rms	103 units 293 hab rms	+19 units +46 hab rms

Table 4: Unit mix by tenure

Unit Size	Shared Ownership		London Living Rent		London Affordable Rent	
	Oct 20 Hearing	Current	Oct 20 Hearing	Current	Oct 20 Hearing	Current
Studio	0%	0%	0%	0%	0%	0%
1-bed	3%	3%	65%	69%	24%	30%
2-bed	97%	97%	35%	31%	58%	55%
3-bed	0%	0%	0%	0%	18%	15%
Total	100%	100%	100%	100%	100%	100%

Grant funding: The Mayor's 'Homes for Londoners Affordable Housing and Viability SPG' 2017 states, "Applications that meet or exceed 35% affordable housing provision without public subsidy, provide affordable housing on-site, meet the specified tenure mix, and meet other planning requirements and obligations to the satisfaction of the LPA and the Mayor where relevant, are not required to submit viability information".

The amended Planning Statement, when commenting on the affordable housing provision confirms, "this offer includes grant funding". As such, the scheme fails to comply with the Fast-Track Route, and the applicant should be required to disclose full viability to demonstrate the maximum affordable housing provision is provided on site. If full viability assessment is not required then this non-compliance with policy should weigh against the scheme.

The Planning Statement confirms the S106 will allow for future improvement to the affordable housing tenure split should Council grant funding come forward in the future, with these units comprising market units within Block A (Core AA) which have the potential to be either LAR or Shared Ownership. However, it is disappointing, and contrary to the Mayor's own SPG and policy H6 (c) (extracts below), that neither the applicants nor the GLA have sought to liaise and explore with the Council as to whether grant is available to secure additional affordable housing units and / or improve LAR provision within the scheme as presented, rather than through reviews within the S106.

"in all cases applicants should determine whether grant and other forms of subsidy are available which should be used to increase the level of affordable housing delivered". (para. 12)

“To follow the Fast Track Route of the threshold approach, applications must meet all the following criteria:

- 1) meet or exceed the relevant threshold level of affordable housing on site without public subsidy*
- 4) demonstrate that they have taken account of the strategic 50 per cent target in Policy H4 Delivering affordable housing and have sought grant to increase the level of affordable housing. (policy H6 (c))”.*

Potential for further improvements of the London Affordable Rented unit mix. There is clear potential for improving the unit size mix of the LAR homes by altering the specified LLR homes in Block C which are to be converted to LAR. The proposed changes were presented to the Council in June 2021 and were discussed with the GLA and the applicants at a subsequent meeting. Housing colleagues requested that further consideration be given to improving the number of family sized LAR homes by swapping one bed LAR homes which are included in the current proposal with two bed LLR homes in the revised mix. There remain a number of such homes in Block C (including 5 x 2 bed 4 person flats) where this can be achieved.

This is likely to alter the overall viability of the scheme, depending on the respective values of the LAR and LLR confirmed by a partnering Registered Provider. The Council is willing in principle to provide grant funding to secure more much needed family sized LAR homes subject to evidence of any gap funding required, and this could be secured prior to completion of the S106 agreement.

Intermediate affordable offer: The Mayor in his Hearing Statement confirmed *‘the applicant has confirmed that these units would be affordable to households as set out below in Table 9, for the first three months of marketing and meet Richmond Council’s expectations in relation to the household income cap.’* Table 9 refers to a household income cap of £47,000, however this was amended to £50,000 in January 2018 via revisions to the Council’s Intermediate Housing Policy Statement. It is therefore requested that this is corrected and reflected in the drafting of the S106 agreement.

Other outstanding matters: All other previous comments and heads of terms outlined in the September 2020 response still apply:

1. Need for marketing plan for intermediate units
2. Wheelchair accessible homes –
 - a. Need for all tenures to incorporate M4(3) wheelchair user dwellings
 - b. An improved mix of wheelchair accessible units required to avoid over-provision of 2 bed 3 person units
 - c. Further details required to demonstrate suitability as wheelchair accessible homes (some units are of an inadequate size or impractical layout to ensure adequate space and circulation space)
 - d. Clause in S106 requiring the developer to liaise with the Council’s Specialist Occupational Therapist to ensure that the identified homes are constructed to Building Regulation requirements (M4(3)(2)(b))
3. Phasing details
4. Review mechanisms – early, late and grant funding
5. Affordability

Living Standards

All previous objections, as set out in the September 2020 response still apply:

1. Block A: Overlooking to the private rear terraces of the townhouses (within the internal courtyard) from units in the northernmost part of this block – suggest obscure glazing to affected windows.

2. Block B: Single aspect units of Block B directly face onto Block D at a distance of only 14.5m.
3. Block C: Inadequate separation (11m) between the northernmost internal units resulting in loss of privacy, overlooking or perception of overlooking.
4. Light:
 - Lack of information, with only a small sample of units tested and of those tested significant failings to comply with BRE guidelines with regard to daylight
 - Of the units tested, only 13 out of the 19 rooms (69%) meet or exceed the recommended ADF targets for internal daylight.

Design

When compared to the scheme presented to the Mayor in October 2020, there are no amendments to the siting, height, or design of the proposed buildings. However, since that hearing there has been a significant change in policy:

- The adoption of the London Plan 2021
- The publication of a revised Framework
- The publication of the government's 'National design guide'
- The publication of the Urban Design Study (UDS) 2021

The 2021 version of the Framework changes the overarching 'social objective' to include "fostering well-designed, beautiful and safe places", and deems the creation of high quality, beautiful and sustainable buildings and places being fundamental to what the planning and development process should achieve, and recognises design is a key aspect of sustainable development. To provide maximum clarity about design expectations, The Framework now requires LPAs to prepare design guides, and in the absence of such, the National Design Guide and the National Model Design Code should be used to guide decisions, which illustrate how well-designed developments can be achieved. The National Design Guide recognises a well-designed place is unlikely to be achieved by focusing only on the appearance, materials and detailing of buildings, it also relies upon having the right layout, form and scale, and in particular the following characteristics:

- Context – a scheme that is influenced by its context and consequentially integrates, relates to, and enhances its surroundings
- Identity – comes from the way buildings and spaces come together. Well-designed developments are influenced by an appreciation and understanding of local character including height, scale and massing and relationship between buildings.
- Built form – that has a coherent pattern of development with the right mix of building types, forms and scale for the context.

The Framework asserts development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and SPDs.

Following the hearing in October 2020, the Secretary of State for Housing, Communities and Local Government issued a set of directions, under section 337 of the Greater London Authority Act 1999, requiring amendments to the Intend to Public London Plan and in particular to Policy D9, which relates to tall buildings:

"..... I am issuing a new Direction regarding Policy D9 (Tall Buildings). There is clearly a place for tall buildings in London, especially where there are existing clusters. However, there are some areas where tall buildings don't reflect the local character. I believe boroughs should be empowered to choose where tall buildings are built within their communities. Your draft policy goes some way to dealing with this concern. In my view we should go further and I am issuing a

further Direction to strengthen the policy to ensure such developments are only brought forward in appropriate and clearly defined areas, as determined by the boroughs whilst still enabling gentle density across London. I am sure that you share my concern about such proposals and will make the required change which will ensure tall buildings do not come forward in inappropriate areas of the capital”.

Following these directions, a further version of D9 was published, which was later adopted in March 2021, which now has full weight as a statutory development plan (with the underlined text added pursuant to the above direction):

Definition

A *Based on local context, Development Plans should define what is considered a tall building for specific localities, the height of which will vary between and within different parts of London but should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey.*

Locations

B

- 1) *Boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan. This process should include engagement with neighbouring boroughs that may be affected by tall building developments in identified locations.*
- 2) *Any such locations and appropriate tall building heights should be identified on maps in Development Plans.*
- 3) *Tall buildings should only be developed in locations that are identified as suitable in Development Plans.*

Impacts

C *Development proposals should address the following impacts:*

1. Visual impacts
 - a) the views of buildings from different distances:
 - i. long-range views (attention to be paid to the design of the top of the building). It should make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views
 - ii. mid-range views from the surrounding neighbourhood –attention should be paid to the form and proportions of the building. It should make a positive contribution to the local townscape in terms of legibility, proportions and materiality
 - iii. immediate views from the surrounding streets – attention should be paid to the base of the building, and should have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street. Where the edges of the site are adjacent to buildings of significantly lower height there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy.
 - b) whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding
 - c) architectural quality and materials should be of an exemplary standard
 - d) proposals should take account of, and avoid harm to, the significance of London’s heritage assets and their settings. The buildings should positively contribute to the character of the area

- e) buildings in the setting of a World Heritage Site must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it
 - f) buildings should not cause adverse reflected glare
 - g) buildings should be designed to minimise light pollution from internal and external lighting
2. Functional impact, including the internal and external design; servicing and management; pedestrian comfort; impact on transport networks; economic impacts areas and potential interference with aviation, navigation or telecommunication, and solar energy generation on adjoining buildings
 3. environmental impact, including wind, sunlight, daylight, air movement, and noise.
 4. Cumulative impacts of the visual, functional and environmental impacts with other consented and planned tall buildings in an area

Part D encouraged free publicly accessible areas within tall buildings where appropriate

Assessment:

Policy LP2 of the Local Plan defines tall buildings as “a *building of 18 metres in height or higher*”. The Hearing report adopted the view that policy LP2 of the Local Plan does not specifically indicate appropriate or inappropriate locations for tall buildings. The Council contests this. In line with D9 B, and to inform the Local Plan, the Council undertook a borough-wide Sustainable [Urban Development Study](#) (2008) to identify potential for higher density development, and particularly taller and tall buildings. The methodology applied followed guidance from both regional and local policy. The conclusions reached are summarised in paragraph 4.2.2, which supports policy LP2:

- higher density development would only be appropriate in the main centres, and.... could potentially be achieved in Whitton, East Sheen and Teddington centres
- The potential for 'tall' buildings is generally clustered close to Richmond and Twickenham train stations (within tall building zones as identified within the Study)
- There are only very few sites outside of the above centres with existing 'tall' or 'taller' buildings, including Richmond upon Thames College, Twickenham Rugby Stadium, Teddington Studios and Mortlake Brewery. Within these specific and exceptional sites, 'taller' or 'tall' buildings may be appropriate, subject to the criteria set out in this policy.
- Elsewhere in the borough it is considered that 'taller' or 'tall' buildings are likely to be inappropriate and out of character with its historic context and local distinctiveness.

As part of the Local Plan Review, in December 2021, the Council published the [Urban Development Study](#) 2021 (UDS) (which was subject to public consultation between 17 May to 16 June 2021), that forms the evidence base of the new Draft Local Plan and is a relevant material consideration. The study includes an up-to-date townscape character assessment of the borough; an assessment of the borough's capacity for growth, and assesses opportunities for tall and mid-rise buildings, illustrated within maps of tall and mid-rise zones of opportunity. Relevant to the proposed application are the following conclusions from the Study:

- The site falls within the North Sheen Residential Area.
- The 11-storey tower block estate (west of the application site) is a looming feature that is poorly integrated into the wider townscape and detrimental to, and out of sync with, the wider townscape, and identified as an unsympathetic and negative quality.
- The commercial development around Homebase and Sainsburys is land-locked and disconnected from its context, lending nothing to the character of the area. There is no rhythm to the aesthetic or layout of buildings and heights are variable.

- North Sheen Residential Area overall has a medium sensitivity to change, however Manor Grove and the BTMs are highly valued, showing cohesion, and therefore higher sensitivity to change.
- There is a need to respect the modest scale and proportions of existing buildings and streets,
- Any new taller elements should respect existing character, have design elegance and quality that marks them as landmarks with special attention to materials and details and avoiding plain façades.
- If the Homebase site should come forward again in future, the recommendations is that a maximum height could be up to 8 storeys (21-24m), and 5-6 storeys (15-18m), however, any development should respect the small scale of the surrounding area and should be set back from Lower Richmond Road.

A.3.2 Lower Richmond Road, North Sheen

Existing prevailing height: 3 storeys

Appropriate height: 7-8 storeys (21-24m)



Fig.427: Lower Richmond Road, North Sheen context map
© Crown copyright and database right 2019.

North Sheen, Lower Richmond Road: Tall and Mid-rise building zones



In summary, the site falls outside an area identified in the adopted Local Plan as suitable for tall or taller buildings. Whilst, the new Urban Development Study identifies the site as having the potential to support mid-rise and tall buildings, the proposed development significantly exceeds the height cap of 5 - 8 storeys (15-18m - 21-24m), and the requirements for any development to respect the scale of the surrounding area. The scheme is thereby deemed to fail compliance with policy D9 B3.

The Council fundamentally disagrees with the Applicants view that part B of D9 is not addressed as the Local Plan (2018), and the Sustainable Urban Development Study evidence base (2008), pre-date the New London Plan, and there are no restrictions on where tall buildings may be acceptable in the borough. The Development Plan must be read as a whole and this includes the adopted Local Plan providing the policies are up to date in the context of the Framework and not in conflict with the London Plan, which LP2 is not for the reasons set out above. Whilst such designation may not be formulated in accordance with the requirements of paragraph 3.9.2 of the London Plan; the Urban Development Study, was informed by a detailed methodology, in line with 3.9.2, including:

1. Review of context and policy background
2. Review, description and evaluation of the character areas within the borough,

3. Identifying where there is capacity for growth, determined by assessing the sensitivity of the character areas.
4. Establishing design principles to establish specific parameters for a design led approach

As well as the scheme failing policy D9 B3, the Council are of the opinion the scheme fails to meet D9 C, in particular visual impacts.

Policy LP2 (para. 4.2.7) states *“existing tall or taller buildings should not be used as a precedent for allowing further, or replacement, tall or taller buildings where the existing ones are harmful to the townscape or amenity”*. Both the Village Plan and the UDS identify the 11-storey tower block estate as a development that is an unsympathetic addition to the wider townscape and detrimental to, and out of sync with, the wider townscape, and identified as an unsympathetic and negative quality.

As previously outlined by The National Design Guide (NDG), a well-designed place relies upon having the right characteristics of layout, form and scale, that integrates and relates to its surroundings, based on an understanding of local character that achieves a coherent pattern of development. However, the scheme appears to have been steered by the two towers, which are deemed as anomalies, rather than the wider townscape.

The scheme is not deemed to display any such characteristics as required by the NDG, and the harm derived from the height can be seen clearly within the long, medium and immediate townscape views. Such views wholly demonstrate the incompatible height, adjacent to the modest two storey Buildings of Townscape Merit in Trinity Road (View 6) with no appropriate transition in scale with the surrounding context; the sheer massing and scale of the development, which is clearly out of character to surrounding context (view 9); the overwhelming quantum and form of development and its consequential proportions and impact on Manor Road, which is sensitive to changes as identified within the UDS (Views 2, 10 and 11) and the wall of development on Dee Road (Views 4 and 12).

View 2



View 4



View 6



View 9



View 10



View 11



View 12



The accuracy of the views is also questioned. The London Plan requires attention to be paid to the design of the roof of the buildings. The roof plan shows extensive roof top plant, including PVs, Air Source Heat Pumps (ASHP), lobby smoke extracts, lift overruns, satellites, of all buildings. Such plant is indicatively shown on the elevations (Image 4), however misleadingly it is not shown on any views, thereby preventing the decision maker to be fully aware of the true visual impact and assess such against relevant policy criteria. Neither is it deemed appropriate for such elements to be left for condition, and contrary to policy D4 of the London Plan that states decision makers should avoid deferring the assessment of large elements of a scheme to the consideration of a planning condition. Further, the Council remains concerned over the lack of visualisations from the south of the site (Townshend Terrace area).

Image 4: Roof top plant indicatively shown in light grey



Policy D4 of the London Plan requires developments to have been thoroughly scrutinised, and for planning decisions to demonstrate how the design review has been addressed. It is deemed the Hearing Report was potentially misleading, stating, “a final review was conducted 22 July 2020...and “The scheme has evolved in an iterative manner in response to these consultations culminating in the amendments submitted on 31 July 2020”. During the last review in July 2020 it was recorded,

“The Panel believe the changes to the massing increases the impact on the context and that the design team should review how and where this can be minimized considering the number of units now proposed”

“The Panel note that the amended views demonstrate an edging up of the height since the November review. The Panel believe that the schemes massing in November was acceptable in terms of its impact on the local context and heritage assets. The Panel recommend that the design team reduce the bulk of the massing where possible. There seems to be scope in the increased number of homes now proposed to accommodate this reduction”

“The Panel agree that the reduction in floor to floor is helpful in minimising in the impact of the massing. This is most evident on the buildings that have not increased in the number of storeys. Where additional storeys have been added the reduction in floor to floor height mitigates some of the increased height. The Panel recommend the design team look at reducing the number of units to further to minimise the impact on massing”.

As such, the London Design Review Panel still has concerns over the height of the development, nor has the scheme been amended to address such concerns as required by policy D4 therefore whilst the scheme has evolved in an iterative manner in response to the comments at DRP it has not been revised to take account of the concerns and comments

around the massing increases which the Panel found to be detrimental and the Hearing report was not explicit on this point.

In summary: Previous objections outlined by the Council in the September 2020 response remain valid. Whilst, the Council fully supports the aims of policy D3 of the London Plan to make the best use of land, follow a design-led approach, and deliver buildings that respond to local distinctiveness and character, through layout, scale and appearance, for the reasons outlined in this section it is deemed this development fails to meet such policy requirements, the characteristics of the National Design Guide, locational restrictions for tall buildings (D9B (3) and the visual impact considerations of policy D9 (C). The scheme has a wholly incompatible, incongruous and overwhelming relationship with the surrounding suburban townscape, in particular the modest two storey terrace properties, designated BTMs, in Trinity Road; the existing buildings and two storey BTMs within Sheendale Road Conservation Area, located within Dee and Sheendale Road; and the two storey terrace properties in Manor Park to the south.

Residential amenity:

The revisions do not reduce the height and mass of the scheme presented in July 2020, and therefore all objections raised in the Council's September 2020 response remain:

- Block B, in combination with Block A and C will result in an unacceptable impact upon the neighbours at 2-6 Bardolph Road and Cliveden House, unreasonably enclosing these properties, with very little relief, and having a significantly harmful impact in terms of visual intrusion.
- Block C, the combined footprint, height and scale of this block will give an oppressive and dominant appearance, offer little relief and appear significantly overbearing, visually intrusive and cause loss of privacy for these occupiers of Cliveden House and Calvert Court.
- Block D, by reason of its siting and height, will have an overbearing and visually intrusive impact and cause undue overlooking to neighbours to the south on Manor Park.
- Daylight and Sunlight Report: Significant impact through loss of daylight and sunlight to surrounding properties, in particular 1-11 Manor Grove; 1 Victoria Villas; 2-6 Bardolph Road and 19-22 Victoria Villas (Cliveden House). Further to this, no information has been submitted to demonstrate that the local environment that the development would impose on neighbouring properties is reflective of the surrounding suburban context.

Energy:

Policy S12 of the London Plan requires major developments to be net zero-carbon and accord with the following energy hierarchy- be lean, be clean, be green and be seen. As part of the latter, 'be seen', the policy states "*as a minimum, energy strategies should contain....a plan to monitor and annual reporting of energy demand and carbon emissions post-construction for at least five years*". The Mayor of London 'Be Seen' energy monitoring guidance' (Draft) states the following information should be provided at application stage:

- Upload the necessary contextual and performance data to the 'be seen' portal
- Confirm the target dates for all subsequent 'be seen' stages
- Confirm the metering plans that will enable the in-use energy performance reporting are in place.

Contrary to the above, the submission fails to provide any such information and proposes for this to be dealt with by the S106. This is inadequate and falls short of the requirements of policy S12 of the London Plan.

Conditions and S106 Heads of Terms previously requested still apply:

- Carbon offset payment

- Whole Life Carbon Assessment

Trees, landscaping and public realm

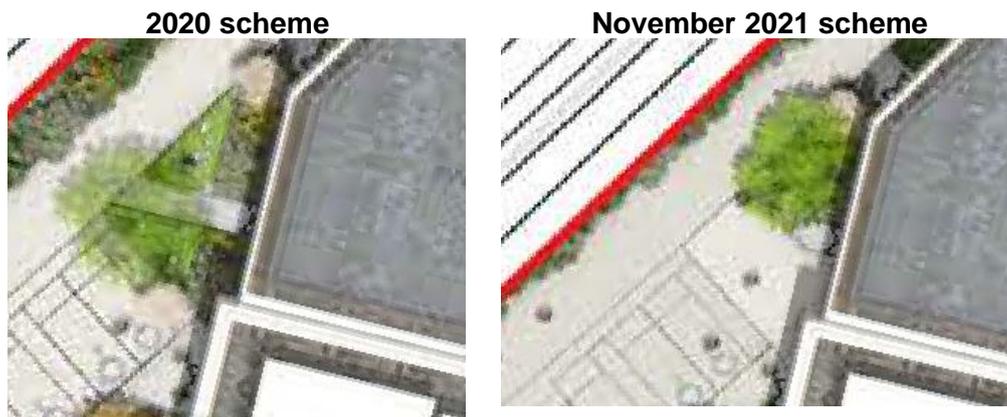
Previously the Council welcomed the more informal approach to the landscaping and the increase in tree planting from 113 to 141 trees, which was deemed suitable mitigation to offset existing tree loss. However, concerns remained over street tree species selection (Gleditsia), and insufficient size of tree pits and associated soil volumes. Conditions were thereby recommended for:

- Tree planting scheme (species and size of tree to be planted)
- A 5-year maintenance plan
- Replacement tree planting should any tree failure within 5 years of planting
- Details of hard and soft landscaping
- Heads of Terms for maintenance costs for any trees within the highway boundary

The changes to the boundary line and subsequent relocation of parking bays, results in loss of pockets of landscaping and relocation of play areas (Image 5), however, it is unclear if there is a corresponding loss of tree planting. The above conditions are thereby recommended to ensure suitably mitigation planting is secured, in addition to the following

- Public Realm to accord with the Public London Charter (Policy D8 of the London Plan)
- Provision of water fountains within the public realm (Policy D8 of the London Plan)

Image 5 – relocated car parking spaces and consequential loss of landscaping



Ecology:

The Framework (para. 180) states, “When determining planning applications, local planning authorities should apply the following principles....(a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused”.

Age of the data: The Preliminary Ecology Appraisal (PEA) and Preliminary Bat Roost Assessment (PBRA) were published in February 2019, with the survey work having been undertaken in 2018 and 2019:

- An ‘extended’ Phase I habitat survey undertaken on 8th August 2018
- A visual inspection of the exterior and interior of the buildings to assess the potential to support roosting bats was undertaken on the 8th August 2018
- A second phase 1 habitat survey undertaken on 14th January 2019

Given the age of the PEA and PBRA, the content and findings cannot be relied upon to inform a sound decision. This is supported by The Chartered Institute of Ecology and Environmental Management [Advice-Note.pdf \(cieem.net\)](#) that state with regards of data:

- *18 months to 3 years: A professional ecologist will need to undertake a site visit and may also need to update desk study information (effectively updating the Preliminary Ecological Appraisal) and then review the validity of the report. Some or all of the other ecological surveys may need to be updated.*
- *More the 3 years – The report is unlikely to still be valid and most, if not all, of the surveys are likely to need to be updated.*

And the following statement within the PEA originally submitted with the application:

The contents of this report are valid at the time of writing...Owing to the dynamic nature of ecological, landscape, and arboricultural resources, if more than twelve months have elapsed since the date of this report, further advice must be taken before you rely on the contents of this report. Notwithstanding any provision of the Tyler Grange LLP Terms & Conditions, Tyler Grange LLP shall not be liable for any losses (howsoever incurred) arising incurred as a result of reliance by the client or any third party on this report more than twelve months after the date of this report.

The reliance on out-of-date reports and surveys will result in any decision being potentially unsound, and open for challenge, whereby the LPA is unable to identify the harm, whether this can be avoided, or whether the harm is adequately mitigated or compensated for, all clear requirements of the Framework.

Urban Greening Factor: The 2020 scheme only achieved an Urban Greening Factor (UGF) of 0.32, falling significantly short of the required 0.4 UGF as required by policy D5 of the London Plan. However, the Intend to Publish London Plan did not have full statutory weight as a development plan. This is no longer the case and despite an increase in the percentage of flower rich perennial planting and climbing plants, by reason of the incremental loss of landscaping, this scheme again fails to meet London Plan policy D5, achieving only 0.31 UGF, almost 25% short of the target and wholly unacceptable, especially considering the location of the site which is sandwiched between two busy train lines; the A316, and Manor Road linking the A316 with the South Circular, all of which is a hot spot for traffic and pollution.

Biodiversity net gain:

- The Framework requires decisions to contribute to and enhance the natural and local environment by...providing net gain for biodiversity (para. 174)
- The London Plan (G6) requires development proposals to aim to secure net biodiversity gain, which is informed by the best available ecological information and addressed from the start of the development process.
- The Local Plan 2018, states “*major developments are required to deliver net gain for biodiversity, through incorporation of ecological enhancements wherever possible*”.
- The NPPG encourages the use of the biodiversity metric to calculate the impact of a development and the net gain that can be achieved. The information needed to populate the metric is taken from pre-development habitat surveys, habitats proposed within the development as well as any additional habitat improvement off-site.

The submission has not undertaken a net gain assessment and proposes only a condition for a Habitat Management Plan when Net Loss and Net Gain calculations will be undertaken. Delaying such assessment until a pre-commencement condition is entirely inappropriate and contrary to the London Plan which requires such assessment be undertaken at the start of the

development process. It is unclear how the GLA or decision maker can make an informed decision of the overall impact on biodiversity without such information.

Green corridors: Railway lines and their sides act as wildlife/green corridors connecting other sites together. The Tyler Grange Preliminary Ecological Appraisal and Preliminary Bat Roost Assessment only considered the buildings on site for bat roost potential and did not look at the connectivity that the railways and the site would have provided. The GIGL data has a number of bat records from all sites of the site, these bats may not use the buildings for roosting but it is highly likely that they commute between roosting and foraging areas such as local parks, allotments and the River Thames.

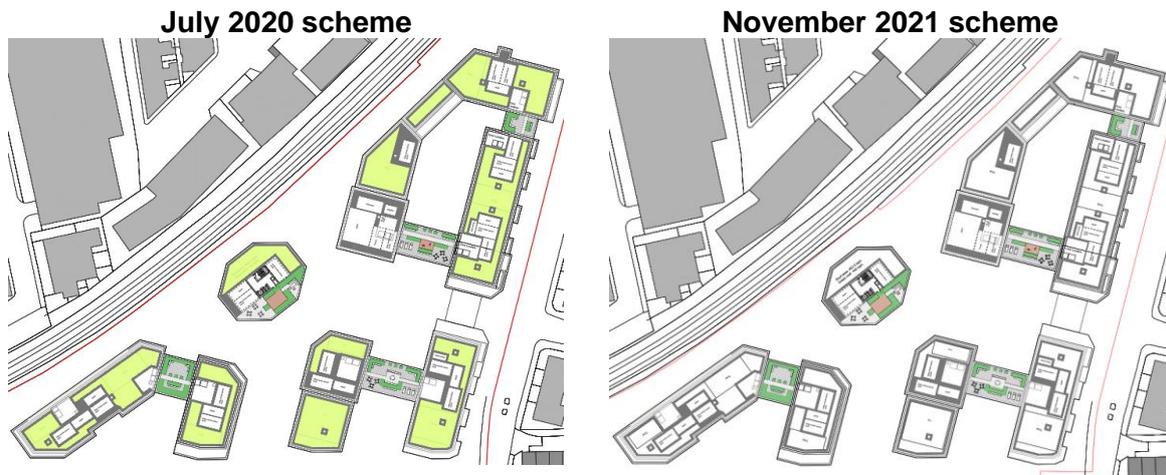
According to GIGL data, both railway lines and their buffer zones have the potential to 'create or restore relict acid grassland', there are also records of hedgehogs, stag beetles, song thrush, house sparrow in the immediate area. This has also not been taken into consideration. The boundary changes along the railway only reduces the minimal soft landscaping that was incorporated (as illustrated in the images 6), and the development misses the opportunity to create some good habitat along the boundaries to enhance the wildlife corridors along the railway lines.

Image 6: Boundary landscaping
Left image 2020 scheme and right image 2021 scheme



Green roof: Policy G1 and G5 of the London Plan seeks green infrastructure to be incorporated within the development recognising urban greening as a fundamental element of a site and building design, with major developments needing to incorporate measures such as green roofs, green walls etc. Local Plan policy LP17 is more prescriptive, requiring at least 70% of any potential roof plate areas as a green / brown roof. The 2021 scheme roof plan shows a significant reduction in biodiverse roof covering (righthand of Image 7) compared to that of the 2020 scheme (left hand image), which also contradicts the drawings presented in the Urban Greening Factor drawing. The Council thereby requests the GLA explore such inconsistency and ensure maximum coverage is proposed, in line with policy, which is secured via condition.

Image 7: Green roof comparisons



If the Mayor is minded to approve the scheme, regardless to such policy failings, the following conditions are requested:

- a) a biodiversity strategy and management plan condition, to include actions from the London and Richmond Biodiversity Action Plans, with a rolling 5-year management plan in perpetuity.
- b) Ecological demolition and construction management plan
- c) Hard and soft landscaping works (plant species to contribute towards wildlife)
- d) Mixed green and brown biodiverse roof
- e) External lighting
- f) Biodiversity Net Gain (including bird and bat bricks (12 per block of each); Invertebrate habitats and Stag beetle loggeries within the landscaping (6 of each); Hedgehog/mammal gaps.
- g) Bat survey and mitigation, and further bat emergent survey

Play

The Council objected to the 2020 scheme on the following grounds, which also supported the Council's view the development represented overdevelopment of the site:

- a) Required provision of U11 play space not being fully provided on site
- b) Financial contribution to off-set onsite shortfall of under11 and over 12s playspace.
- c) Concerns over safety and appropriateness of the siting of the half ball court in the SW corner of the site, given its isolation and lack of natural surveillance.
- d) The distribution of playspace throughout the site in small areas and within landscaping and trees, thereby diminishing their value and useability
- e) Need for further information to demonstrate play provision and equipment can cater for development need and has safety clearance space
- f) Condition for accessible play and site management controls.

The relocation of the refuse holding area impacts the doorstep play provision along the western access, however, this 29m² area is proposed to be reprovided in the south eastern corner of the site, thereby resulting in no loss of on-site play provision (Image 8). Notwithstanding such, all previously identified objections remain.

Image 8: Revised play provision (left July 2020 and right November 2021)



Transport:

Public transport

Since the last iteration of the Transport Assessment (TA) in 2020 there have been the following changes to the bus and rail services, which has resulted in the sites public transport accessibility level (PTAL) being reduced from 5 to 4. For clarity - PTAL is calculated based on available bus services within 660m walking distance of a site and available rail services within 960m walking distance of a site between 08.15 and 09.15 on a weekday.

Changes to bus services:

- Route H37 frequency reduced from 10bph to 8bph.
- Route 493 terminates at Richmond Bus Station rather than Richmond Manor Circus. However, whilst route 493 will no longer serve Manor Circus, it will continue to service the south side of the site from East Sheen (albeit a longer walk time)
- Route H22 will no longer operate between Richmond and Twickenham
- Route 391 will be renumbered to 110

The changes set out above will result in a combined total reduction of 10 bus trips per hour for residents in comparison to the original assessment. Notwithstanding such a reduction in bus routes, the site still benefits from the following bus routes that will serve (within 640m) the application site: 371 and R70 (Manor Road), 110, 190, 419, H37, R68 and N22 Manor Circus and 33, 337, 493 and N33 (at East Sheen).

Changes to rail services:

There may be a permanent increase of one train per hour to London Waterloo in the AM weekday peak hour between 08.00 and 08.59, and a decrease of two trains per hour to London Waterloo in the off-peak period. Notwithstanding such change, residents of the site will still have access to five services per hour from North Sheen Station in the AM weekday peak hour. As stated within the TA, *“As the PTAL rating is calculated based on AM peak period services, the proposed amendments to off-peak services will have no impact on the rating of the site”*. Off peak and during the inter-peak periods, the number of services to and from North Sheen station will be reduced by 50%.

The changes to the off-peak trains may impact upon residents wishing to commute after 09:15 due to the increase in hybrid working and COVID-19 and reduce access to leisure opportunities by rail. However, buses R70 and 371 provide a combined total of 13 buses per hour from bus stops SC and SU within a short walk of the main pedestrian access point into the site, and go to Richmond Mainline Railway Station, from which more regular surface rail services to and from central London can be accessed, as well as London Underground and Overground services. Although Richmond Station is 1,280m walk from the main access to the

site, above the maximum recommended walking distance of 960m, the topography is flat and the pedestrian environment of a high standard.

Paragraphs 5.4.6 of the revised TA states, *“It is noted that, with the revised services, TfL remain satisfied that there is sufficient spare capacity on the bus network to accommodate the uplift in bus demand generated by the development”*. The Council has not had sight of such confirmation. If any uplift in bus service is required, this should be secured via the S106.

Parking Provision: Policy LP45 of the Local Plan recognises car free housing developments may be appropriate in locations with high public transport accessibility, such as areas with a PTAL of 5 or 6, subject to the provision of disabled parking; appropriate servicing arrangements; and securing controls to ensure the proposal does not contribute to on-street parking stress in the locality. In PTAL areas of 4-6, parking provision at a level lower than the standard may be appropriate where this can be demonstrated as acceptable, taking account of local characteristics, availability of sustainable modes of travel and public transport provision, and availability of on-street parking spaces.

Policy T6 of the London Plan states *“car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking (‘car-lite’). Car-free development has no general parking but should still provide disabled persons parking in line with Part E of this policy. An absence of local on-street parking controls should not be a barrier to new development, and boroughs should look to implement these controls wherever necessary to allow existing residents to maintain safe and efficient use of their streets”*.

Policy T6.1 of the London Plan allows for a maximum parking provision of 0.5-0.75 spaces per dwelling within this development, based on PTAL rating and unit sizes. Therefore, the scheme could provide a maximum parking provision of 227 – 340 spaces associated to the residential element of the development. (This is a significant change since the Hearing, when the ItP London Plan required car free in response to the sites previous PTAL rating of 5).

The scheme retains the number of onsite spaces as proposed in the 2020 scheme (14 disabled bays and 2 car club bays), however, the car club bays and disabled bays have been relocated in response to the boundary changes, of which no objection is raised.

The Framework (para. 111) states, *“Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe”*.

The Council has not formally objected to the principle of the development being car free, subject to mitigation secured through a Section 106 including implementation of a Controlled Parking Zone; restriction on future CPZ permits; Travel Plans and associated monitoring, provision of two car club bays and associated membership and improvements to public transport. Whilst the PTAL rating has been reduced to 4, by reason of the proximity to North Sheen station, availability of bus routes in close proximity to the site; subject to securing the aforementioned mitigation through the S106; and in response to London Borough of Richmond’s designation as an Air Quality Management Area (AQMA), no objections is raised to the parking provision. Thereby and in line with the Framework it is deemed any impact from the development can be effectively mitigated and as such will not cause a severe impact.

Controlled Parking Zone: The Council’s acceptance to a car free development is reliant of £100,000 being secured through a S106 for necessary CPZ reviews and implementation, which must be paid prior to the commencement of development; and precluding future occupants from CPZ permits. Without such, it will not be possible to mitigate the effect of

overspill on-street vehicular parking from the development to an acceptable degree in accordance with Para. 110d of the Framework.

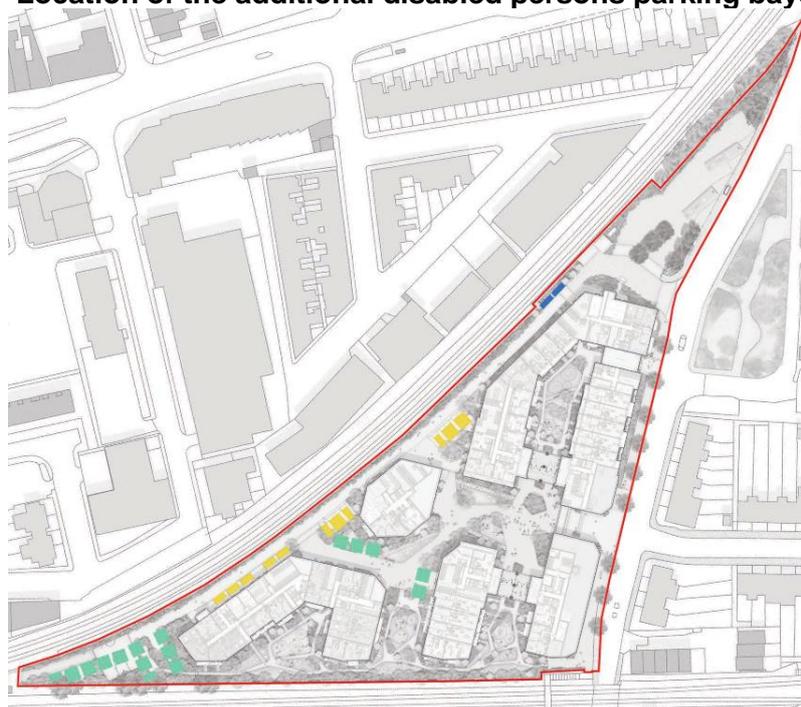
Disabled persons parking bays: Policy T6.1 of the London Plan requires 3% of dwellings to have at least one designated disabled persons parking bay per dwelling from the outset, and for any scheme to demonstrate how an additional 7% of dwellings could be provided with one designated disabled persons parking space in the future. The Framework requires all applications to address the needs of people with disabilities.

Comments outlined in the Council's 2020 response remain applicable:

- a) Accessible car spaces are proposed for 3% of the units (14 spaces).
- b) It is unclear as to how suitably located the disabled persons parking bays are for the Wheelchair User Homes.

The Council also objected to the location of the additional provision (7% of dwellings), which equates to 30 spaces, whereby these resulted in an unacceptable loss of amenity space, playspace, landscaping and short-term cycle parking, again, reflecting overdevelopment of the site, as illustrated in Image 9. The 2021 scheme fails to address previous concerns. In light of the revised boundary changes and the consequential relocation of car club bays and parking space and loss of landscaping, the previous objections are even more pertinent.

Image 9: Location of the additional disabled persons parking bays in green



Highway and pedestrian safety: The Council's previous comments on safety remain:

- 1) Concerns over the pedestrian level of comfort at the courtesy crossing south of the main access to the site.
- 2) The Council's pedestrian level of comfort assessment at this crossing point using TfL's methodology scores 41% restricted movement. This is classed as acceptable rather than comfortable. As such, the following is recommended:
 - High quality crossing facilities
 - Tactile paving is inserted on both footways on Manor Road at this location as well as at the refuge itself,

- Further details are provided, as part of the S278 highway works process, as to what exactly the applicant will provide for the £60,000 pedestrian improvement works at the level crossing.
- 3) Need for a stage 1 and 2 Road Safety Audits as part of the S278 highway works approval process.

Cycle parking: The scheme complies with London Plan minimum parking standards, which is supported, and a condition is requested to ensure delivery and they are designed in accordance with chapter 8 of the London Cycle Design Standards. Notwithstanding such, the Council's Air Quality SPD, a material planning consideration in the assessment of this application, sets a requirement for developments to demonstrate how cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people and the carriage of children. Further, the Framework requires all developments to give priority to cycle movements and the needs of people with disabilities and reduced mobility in relation to all modes of transport. The scheme fails to include any such provision, and in light of the users of the development being reliant on sustainable travel, this should be weighed against the scheme.

Section 106 legal agreement and Section 38 and Section 278 works

1. The following financial contributions Heads of Terms are requested:
 - a. Controlled Parking Zone contribution – review and implementation
 - b. £380,000 towards pedestrian improvements at the Manor Circus roundabout junction north of the site access
 - c. £15,000 towards safety improvements at North Sheen railway station
 - d. £60,000 towards pedestrian improvements at the existing level crossing on Manor Road south of the site access
 - e. £30,000 towards a North Sheen railway station access feasibility study
 - f. £50,000 towards a feasibility study for the expansion of existing or the creation of new controlled parking zones to mitigate the impact of overspill vehicular parking on streets close to and because of the proposed development
 - g. £50,000 towards the implementation of any controlled parking zones decided upon because of the above studies
 - h. £40,000 towards passenger improvements within North Sheen railway station
 - i. A clause that prohibits all occupants of the proposed development from purchasing vehicular parking permits within any existing or newly implemented controlled parking zone within the Borough of Richmond.
 - j. The provision of two car club parking bays within the site and the provision of free membership of that car club for initial occupants of the site for up to three years.
 - k. The provision of 20% of the on-site parking bays with active means of electric charging and 20% with passive means of electric charging.
 - l. Submission and monitoring of both the commercial and residential travel plans for 5 years
 - m. Submission and monitoring of the Construction Management Plans and community engagement officer
2. Completion of the following works on the highway under S278 of the Highways Act 1980, prior to the first occupation of the site:
 - a. The repaving and widening of the footway on the western side of Manor Road along the eastern frontage of the site as shown indicatively on Drawing No. P11559-00-001-100 (the applicant will also need to enter into an agreement under S38 of the Highways Act 1980 should it wish to offer the net new footway for adoption as highway maintainable at public expense. They may incur a commuted sum for the cost of maintaining the additional highway over 30 years).
 - b. The implementation new dropped kerbs and tactile paving at the existing and proposed vehicular access to and egress from the site as shown indicatively on Drawing No. P11559-00-001-100

- c. Tactile paving on the existing footway and at the existing pedestrian refuge south of the site access on Manor Road
- d. The pedestrian improvement works at the level crossing south of the site that will be funded by the £60,000 mentioned above.

Waste:

The addendum report presented to the Mayor in October 2020 states, “*Richmond Council expressed concerns that the scheme would not provide sufficient bin storage capacity to meet the weekly collection requirement set out within the Refuse and Recycling SPD. The applicant has provided some further clarification demonstrating that the scheme would be able to accommodate 96 euro bins of waste storage capacity across the site: 92 for the residential component and 4 for the commercial component. This provision would exceed the requirement for weekly collection set by the Refuse and Recycling SPD, which in this case would require 87 euro bins for the residential component and 2 euro bins for the commercial component and facilitate weekly collection*”.

The 2021 scheme includes a Waste Management Strategy which sets out the scheme will provide 28 x 1,100 litre bins for residential refuse and 23 x 1,100 litre bins for residential recycling, and assumes and relies upon two residential waste collections per week for both refuse and recycling (and one for commercial).

Policy LP24 of the Local Plan requires all developments, to provide adequate refuse and recycling storage space and facilities. The London Borough of Richmond Refuse and Recycling Storage Requirements SPD sets out the following requirements:

- Per unit – capacity of 70l per bedroom
- Per 70 flats – 6 1100l bins:
 - 3 x 1100l bins for mixed paper, card, and carton recycling
 - 3 x 1100l bins for mixed container recycling

The scheme provides 767 bedrooms, and therefore the following refuse and recycling storage facilities should be provided to cater for the development needs:

- 49 x 1100l bins for general waste
- 19 x 1100 bins for mixed paper, car, and carton recycling
- 19 x 1100 bins for mixed container bins

The scheme significantly falls short of the necessary onsite recycling and refuse needs of the development (both in storage and holding areas), and again represents a symptom of overdevelopment.

The Council does not provide twice weekly bin collections for residents, therefore prior to any decision being made, clarity must be provided as to how the applicants intend to secure the second weekly collections. Is it intended for this to be undertaken by Borough-contracted services or by a private contractor? If the former, a financial contribution will need to be secured in the S106 agreement, in perpetuity, however, this will have consequences on the affordability of service charges for the affordable housing provision.

If a twice weekly collection can be secured, the new refuse holding area on the eastern side of the access road, which holds 25 x 1,100 bins at a time, is acceptable. The Strategy advises, onsite facilities management teams will move the bins from the blocks Cores AB, AC, DA and DB to the holding area, and the refuse vehicles will service the remaining blocks along the access road.

The submission provides a vehicle tracking for a refuse vehicle of 11.8m x 2.5m entering and exiting the service road. However, insufficient information has been provided to demonstrate

refuses vehicles can manoeuvre within the site, and a vehicle is within 20m of any collection point. Therefore, the following must be provided prior to any decision:

- Demonstrate that a vehicle (10.4m x 2.5m) can get within 20m of any refuse collection point without having to reverse more than 12m.
- Confirmation the material on the shared spaces within the forecourt is durable to take the weight of a fully laden refuse HGV which is approximately 40 tonnes.
- The main pedestrian entrance to the site will need to have collapsible bollards. This is to provide emergency service vehicles with a second access if the primary access is blocked.

Flooding and drainage:

The Framework states *“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.”* (para. 159), and *“when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere...Development should only be allowed in areas at risk of flooding where it can be demonstrated*

- a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;*
- b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;*
- c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;*
- d) any residual risk can be safely managed; and*
- e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan”* (para. 167)

Policy SI12 and SI13 of the London Plan requires surface water runoff and flood risk for all sources across London to be managed; for development proposals to ensure that flood risk is minimised and mitigated; and for developments to achieve greenfield runoff rates.

Paragraph 9.13.1 of the London Plan states, *“Local Flood Risk Management Strategies and Surface Water Management Plans should ensure they address flooding from multiple sources including surface water, groundwater and small watercourses that occurs as a result of heavy rainfall”*.

Since the hearing in October 2020, the London Borough of Richmond’s Strategic Flood Risk Assessment [Strategic Flood Risk Assessment - Level 1 \(richmond.gov.uk\)](https://www.richmond.gov.uk) has been updated (most recently March 2021). Whilst the application site is within flood zone 1, the SFRA confirms the site is within an area susceptible to groundwater flood (more than 75%), surface water flooding (1 in 30; 1 in 100 and 1 in 1000 chance across the site), has critical drainage issues and is within a throughflow catchment area [Aurora \(richmond.gov.uk\)](https://www.richmond.gov.uk). Based on the SFRA the following documents and assessments are required for this application (refer to Table 6-1 of the SFRA):

- 1) Sequential Test – in response to the site has surface water, ground water and critical drainage flooding issues
- 2) A site-specific Flood Risk Assessment
- 3) Statement on SUDs
- 4) Completion of the Richmond upon Thames Sustainable Drainage Proforma
- 5) Basement Screening Assessment and potentially a Basement Impact Assessment - [user guide basement assessment.pdf \(richmond.gov.uk\)](https://www.richmond.gov.uk)
- 6) Flood emergency Plans

The 2020 scheme was accompanied by a Revised Flood Risk Assessment and Drainage Strategy. No further revisions or updates to the said report have been made in light of the adoption of the London Plan 2021, Framework 2021 and SFRA. From review of the formally submitted FRA and Hearing Report presented to the Mayor of London, and based on the new additional requirements of the SFRA 2021, the following reports and assessments remain outstanding:

- Sequential Test
- Completion of the Richmond upon Thames Sustainable Drainage Proforma
- Basement Screening Assessment and potentially a Basement Impact Assessment
- Flood emergency Plans

In the absence of the above documents, the decision maker is unable to evaluate the potential direct and indirect impacts of the proposed development and determine whether the development will be safe for its lifetime and not lead to increased flooding elsewhere, contrary to development plan policies and the Framework.

The Council strongly encourages the GLA to consult the Lead Local Flood Authority on drainage matters.

Noise pollution:

Previous comments apply (need for further mitigation from the half call-court).

Digital Connectivity

A Digital Connectivity report is provided to demonstrate compliance with policy S16 of the London Plan, namely, confirming, ducting space for full fibre connectivity infrastructure; ability to meet demand for mobile connectivity; measures to avoid reducing mobile connectivity in the surrounding area. The report states further work is necessary at RIBA stage 3 to understand the impact of the buildings upon local mobile coverage and identify any necessary mitigation. It is thereby recommended a condition is secured to ensure such review and mitigation is undertaken and secured.

Air Quality:

The Council requests the following heads of terms and conditions:

- a) Behavioural change funding for cycle training/cycle maintenance courses of £5,000 over 2 year
- b) Proportionate contribution to the Council's replacement air quality unit of £10,500 (total cost approx. £57,500)
- c) Proportionate contribution to 2 x years running costs of LBRUT's air quality monitoring stations - £3,750 pa x 2, total £7,500 required to continue to monitor and measure pollutant levels to ensure that this development does not lead to further deterioration of existing poor air quality or create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits
- d) Robust service and delivery plans
- e) Robust travel plans
- f) No access to any existing or future nearby CPZ.

Impact on local infrastructure

Education: Previous comments remain valid.

Health: The 2021 amendments do not alter the number of residential units or the mix, in terms of the split between private and affordable homes or bedroom sizes. As such, the healthcare impact remains the same and the mitigation in the form of s106 healthcare contribution of £193,500 is still required. Failure to secure such contribution through a S106, the development would have an unacceptable pressure and impact on health services.

Environmental Impact Assessment:

Whilst the Council and the GLA have issued Negative Screening Opinions (14 December 2018 and 24 August 2020 respectively), in light of the changes to local bus and rail services (and the subsequent lowering of the sites PTAL rating to 4), site boundaries and regional and national policy, the Council requests the GLA to give full consideration as to whether a further screening opinion should be undertaken prior to a decision.

Other matters:

The GLA is requested to take into consideration:

- All representations submitted to the Council on this application, notably in relation to the most recent consultation - [Planning detail - London Borough of Richmond upon Thames](#)
- Thames Water comments – Appendix 5

Summary:

The NPPF sets out the purpose of the planning system is to contribute to achieving sustainable development, which includes three overarching economic, social and environmental objectives which should be pursued in mutually supportive way.

The 2021 version of the Framework sees the creation of high quality, beautiful and sustainable buildings and places being fundamental to what the planning and development process should achieve, and recognises design is a key aspect of sustainable development. To foster good design, the government has published National Design Guide, which recognises well designed places is reliant upon delivering the right layout, form and scale, and based upon an understanding of the areas context, identity and local built form. Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and SPDs.

The proposed development site is located outside an area identified as appropriate for tall buildings within the Richmond Local Plan 2018, and exceeds the heights deemed to be suitable with the 2021 Urban Development Study. Notwithstanding such failing, the Council recognises that recent [case law](#) acknowledges it is possible for policy D9B(3) not to be followed if it was outweighed by other policies in the development plan, or by material considerations (para. 84 of judgement). However, as the above letter sets out there are a number of significant areas of policy conflict and areas where information has not been provided to enable an assessment against policy, most notably the lack of a Sequential Test in relation to all sources of flooding, it is deemed the development conflicts with the development plan as a whole, and non-compliance with two of the overarching objectives (social and environmental) as set out in the Framework that are key to achieving sustainable development, and thereby warrants a refusal of planning permission:

- **Design and height:** As outlined in this response (and the original planning committee report and the Council's 2020 response to the GLA), the proposed height and massing of the development, will be wholly overwhelming on the surrounding townscape, representing an unsympathetic and incompatible addition when seen in context with the surrounding pattern of development, and in turn represent a visually intrusive overwhelming form of development to surrounding residential amenities, thereby failing two of the overarching objectives (social and environmental) that contribute to achieving sustainable development and contrary to policies LP1-5 of the Local Plan, policies D3, D4 and D9 of the London Plan and NPPF.
- **Wheelchair housing:** Failure to deliver a choice of housing across all tenures, contrary to D7 of the London Plan.

- Affordable housing: Failure to comply with the fast track route, with the reliance on grant from the GLA and lack of engagement with the Council to determine if additional affordable housing can be delivered through grant funding, contrary to policy H6 of the London Plan and the Mayor's 'Homes for Londoners Affordable Housing and Viability SPG' 2017.
- Residential standards: Unacceptable overlooking between units, contrary to LP8 of the Local Plan; and insufficient play space on site, especially if the additional disabled parking bays are provided, which utilises the already inadequate playspace.
- Residential amenity: Overbearing, loss of light and privacy on surrounding residential amenities, thereby contrary to policy LP 8 of the Local Plan and D9 of the London Plan.
- Transport: Absence of any storage provision for cycles for disable people, contrary to the Framework and the Council's Air Quality SPD.
- Waste: Failure to provide sufficient refuse and recycling facilities to meet the needs of the development, contrary to the Council's Refuse and Recycling SPD'
- Flooding: Absence of necessary reports, notably, sequential test, Sustainable Drainage Proforma, basement screening and impact assessment and flood emergency plans, and thereby the failure to meet the requirements of policies SI12 and SI13 of the London Plan, LP21 and LP22 of the Local Plan and the SFRA; and the ability to demonstrate the development will be safe for its lifetime and not lead to flooding elsewhere.
- Energy: Failure to meet the energy hierarchy, in particular, be seen, contrary to policy SI2 of the London Plan.
- Ecology: Reliance on out-of-date data; failure to achieve an Urban Greening factor of 0.4 contrary to policies D5 of the London Plan; absence of Biodiversity Net Gain calculations contrary with policy G6 of the London Plan and NPPG; impact upon green corridors; and outstanding questions on the green roof as required by G1 and G5 of the London Plan.

In this instance, the scheme appears to be driven by housing targets, rather than the wider ambition of sustainable development the NPPF seeks. Given the Borough's current housing delivery performance and the affordable housing pipeline, the significant harm to townscape, residential amenity and heritage assets borne from the excessive and insensitive height and harm through the non-compliance with wheelchair housing, energy, flooding, ecology, residential standards, transport and waste policies indicates that planning permission should be refused and there are no material planning considerations which indicate otherwise.

Yours sincerely



Jenifer Jackson
Assistant Director of Environment & Community Services (Planning and Transport)

Enclosed.

- Appendix 1: Committee Report and Planning Committee minutes - 3 July 2019 [Agenda for Planning Committee on Wednesday, 3 July 2019, 7:00 pm - London Borough of Richmond upon Thames](#)
- Appendix 2: LBRuT Response to 2020 revisions (attached to email)
- Appendix 3: GLA Representation Hearing report - [Homebase Manor Road \(london.gov.uk\)](#)
- Appendix 4: GLA Representation addendum - [Manor Road Addendum \(london.gov.uk\)](#)
- Appendix 5: Thames Water response (attached to email)

3 September 2020

Richard Green
Planning
Greater London Authority
The Queen's Walk
London
SE1 2AA

Dear Richard Green,

**Re: 84 MANOR ROAD
HOMEBASE MANOR ROAD PUBLIC HEARING
PUBLIC CONSULTATION ON AMENDED APPLICATION
(LOCAL AUTHORITY REF: 19/0501/FUL / GLA REF: 4795)**

1.0 Introduction

- 1.1 Thank you for the email consultation notification, dated 6th August 2020, regarding the revisions to the abovementioned planning application. This follows an earlier public consultation, which took place between December 2019 and January 2020, to which The London Borough of Richmond upon Thames (the Council) responded (Appendix 1). This letter should be read in conjunction with this earlier response.
- 1.2 To summarise the history of this application, the applicant entered into pre-application discussion with the Council as part of a Planning Performance Agreement prior to the planning application being submitted in February 2019. Disappointingly, much of the advice given was not reflected in the submitted scheme. On 3 July 2019, the Council's Planning Committee (the Committee) resolved to refuse the application on six grounds: (Refer to Appendix 2 for full details as set out in the Committee Report and Minutes):
1. Affordable housing
 2. Design
 3. Residential amenity
 4. Living Standards
 5. Energy
 6. Absence of legal agreement to secure necessary Heads of Terms
- 1.3 On 29 July 2019, the Council received notification that the Mayor would act as the Local Planning Authority for the purposes of determining the application (under Article 7 of the Mayor of London Order and the powers conferred by Section 2A of the 1990 Town and Country Planning Act) and, since then, Officers of the Council have attended a number of London Design Review Panel meetings (the most recent being July 2020) on various revisions to the scheme and have also been present for meetings regarding details for the Section 106 Agreement.
- 1.4 In July 2020, an amended scheme was submitted to the Greater London Authority:

Demolition of existing buildings and structures and comprehensive phased residential-led redevelopment to provide 453 residential units (of which 173

units will be affordable), flexible retail, community and office uses, provision of car and cycle parking, landscaping, public and private open spaces and all other necessary enabling works

1.5 A summary of the amendments include:

- Increase of residential units from 385 as originally submitted to 453 through increase in heights to some buildings and optimisation of layouts;
- Increase in height of building A (core A) by 1 storey, increase in building B by 2 storeys, increase in building C (core A) by 3 storeys and increase in building C (Cores B and C) by 1 storey.
- Decrease in height of building A (core D) and D (core B) by 1 storey;
- Reduction in floor to floor heights from 3.3m to 3.15m
- Removal of Building E which was part of the revisions made on 22 November 2019.
- Increased provision of affordable housing from 35% (134 units) to 40% (173 units) (with grant funding) by habitable room and amendments to tenure split from 30/70% affordable rent / intermediate to 52/48%.
- Reduction of basement and relocation of cycle parking and bin storage to ground floor of each Block.
- Increase in cycle parking to meet draft London Plan standards.
- Design amendments to maximise residential quality including additional cores, dual aspect units along Manor Road, less north facing units, increased overlooking distances and improvements to residential amenity spaces.
- Rearrangement of commercial floorspace including extending Block D commercial frontage towards North Sheen Station and removal of retail pavilion in central courtyard.
- Alteration to building elevations and detailed design.
- Public realm amendments including redesign of the central courtyard; revisions to the play space strategy; introduction of a half ball-court; and reconfiguration of car parking.
- Amendments to the site-wide Energy Strategy to comply with the London Plan Energy Hierarchy.

1.6 This letter forms the Council's formal response to the July 2020 amended scheme.

2.0 Land Use

Commercial floorspace:

2.1 The commercial element is broadly the same as per the November 2019 amended scheme, with a slight increase in floorspace. The Council has no objections to this element of the scheme.

Affordable Housing

2.2 A summary of the quantum and tenure of the proposed affordable housing is outlined in Table 1, with a comparison to earlier iterations of the scheme.

Table 1: Affordable housing quantum and tenure

	Original scheme submitted to Richmond	as LB	December 2019 scheme		July 2020 scheme	
No. of Affordable Homes	134		171		173	
% no. of Affordable Homes	35% by habitable room 35% by number of units		40% by habitable room 39% by number of units		40% by habitable room 38% by number of units	
Tenure Split (number)	Affordable Rent – 40		Affordable Rent	75 (44%)	Affordable Rent	84 (49%)
	Shared Ownership – 94		Shared Ownership	58 (34%)	Shared Ownership	34 (20%)
			London Living Rent	38 (22%)	London Living Rent	55 (32%)
Tenure Split (habitable rooms)	Affordable Rent – 36%		Affordable Rent	50%	Affordable Rent	52%
	Shared Ownership – 64%		Intermediate	50%	Shared Ownership	21%
					London Living Rent	27%

- 2.3 The following aspects of the scheme are welcomed:
- Increase in affordable provision from 35% to 40%;
 - Increase in affordable rented units;
 - Improvements to the tenure split – notably the increase in affordable rent units;
 - The size of affordable units now being closer to National Design Standards.
- 2.4 Notwithstanding the above, there remains several outstanding comments / objections in relation to the affordable housing provision proposed:
- Level / uplift of affordable housing provision
- 2.5 The proposal falls short of the 50% provision as set out in Local Plan policy LP 36 and, the requirements of the Fast Track Route in terms of tenure mix are not being met. Therefore, in order to ensure compliance with the Development Plan, a viability review should now be undertaken to demonstrate that the maximum reasonable provision of affordable housing is being delivered, or the material considerations which indicate a different decision is justified should be set out.
- 2.6 The Council supports the flexibility as to the use of grant funding which has enabled the scheme to significantly enhance the provision of affordable housing to 40%. However, to improve the affordable housing and tenure mix, so to better meet the Mayor and Borough affordable housing requirements set out in the adopted Development Plan, the Council would welcome the opportunity to explore the potential to provide additional units and / or adjust the tenure mix, specifically to swap intermediate homes and LAR homes in order to improve the number of family sized (2b4p and above) rented homes, with support from the Council's Housing Capital Programme.
- 2.7 Further modelling would be required to confirm that the proposed affordable mix proposed provides the optimum level and tenure mix of affordable homes which can

be achieved through a S106 clause to consider the potential of Mayoral grant together with the Council's Housing Capital Programme funding.

Tenure mix

- 2.8 The GLA Mayoral requirements for affordable housing tenure mix (by habitable room) is 30% London Affordable Rent; 30% shared ownership and 40% Richmond compliant tenure mix. This equates to 295 London Affordable Rent habitable rooms and 182 habitable rooms (LLR/Shared ownership) allowing for the Richmond compliant tenure mix.
- 2.9 As now proposed, the scheme delivers 247 habitable rooms as London Affordable Rent and 230 habitable rooms as shared ownership/London Living Rent. Therefore, although there has been an increase in rented units, the proposed tenure mix by habitable room still fails to comply with both the Mayoral and Richmond development plan policy requirements and is weighted towards delivery of intermediate homes. The scheme is therefore not meeting the requirements of the 'Fast Track Route' regarding tenure mix and the Council would welcome request evidence of the schemes viability which might provide the justification for a departure from such or welcome details of the material considerations relevant to this matter and to be considered under Section 38(6) of the Planning Act.

Unit Mix

- 2.10 The London Affordable Rent units comprises 20 x 1 bed units, 35 x 2 bed 3 person units, 16 x 2bed and 3bed 4 person units and 13 x 3bed 5person units. The evidence of the current availability of social rented homes in the Borough identifies a high proportion of one bedroom homes and LAR homes at rents that exclude service charges that are difficult to let (especially to downsizing households on target rents releasing family sized homes) when the priority need is for family sized homes. The Council would therefore seek further modelling to ascertain whether 1 bed and 2 bed 3 person London Affordable Rent homes could be swapped with family sized (2b 4p) London Living Rent or Shared Ownership homes to achieve a better mix of LAR homes.

Affordability

- 2.11 The shared ownership units are based on the GLA's affordability criteria, with gross annual salary requirements for the one bed units of £62,765 and for the two bed units of £80,072. The proposed shared ownership homes comprise 1 x 1 bed, 6 x 2 bed 3 person and 27 x 2 bed 4 person homes.
- 2.12 Notwithstanding the current Mayoral affordability household income cap of £90,000, the Mayor's stated position is that shared ownership homes should be affordable across a range of incomes within this cap. As proposed, neither the Borough's affordability requirements (two thirds of shared ownership units being affordable at household incomes not exceeding £47,000) nor the Mayor's stated position in the London Plan Annual Monitoring Report (October 2019) that Shared Ownership average household incomes should not exceed £56,200pa would be achieved.
- 2.13 Therefore, it is necessary for the applicant to demonstrate how, if not through shared ownership sales, the affordability requirement will be met. For example:
- through conversion of units to intermediate rent/LLR where there is more control of affordability through the rent setting process.
 - Registered Providers setting the equity share and rent on the unsold equity in order to achieve the Council's requirement that two thirds of the shared ownership homes

(including disposal of LLR homes as shared ownership) are affordable for a household income of £47,000. If this cannot be achieved an alternative approach to the provision of intermediate housing should be required given there is a very clear and well evidenced need and demand locally for low cost intermediate housing at the income threshold of £47,000 identified.

- 2.14 The London Living Rent homes would require household incomes of £50,100 for a one bedroom flat and £56,300 for a two bedroom flat based on the Mayor's ward based LLR levels for 2020/21. Based on Borough-wide median rent levels (VOA data for 2018/19) LLR for these homes would be at more than 90% of market rent.
- 2.15 Shared Ownership and London Affordable Rent (LAR) need to account for service charges. The Council expects overall housing costs to be affordable to the Council's income threshold for shared ownership. This is applicable to the Mayoral threshold for LLR, as well as those which would be assumed for LAR.

Marketing

- 2.16 The GLA has previously supported a period of local marketing and prioritisation on other schemes, and therefore, the Council recommends any Section 106 incorporates a clause requiring the Applicant to provide a marketing plan which sets out how the intermediate housing will be marketed and for a period prioritised for sale or letting to those living or working in the borough of Richmond in housing need. Such an approach helps:
- address the identified local borough-level need and demand for such accommodation;
 - to demonstrate to borough residents the local benefits of the development.

Wheelchair accessible homes

- 2.17 Whilst the 10% requirement for wheelchair user dwellings is met through 17 Affordable Rent homes, none of the Intermediate units are identified as wheelchair user dwellings. As a result, further amendments are required to ensure compliance with the Council's (and Mayoral) requirement for 10% of the units across all tenures are M4(3) wheelchair user dwellings – policy D7 of the London Plan Intend to Publish. Once demonstrated on plans, this should subsequently be secured through the Section 106.
- 2.18 The Borough also makes the following comments on the layout and suitability of the proposed M4(3) homes:
- An improved mix of wheelchair accessible units is required to avoid over-provision of 2 bed 3 person units
 - Further details are required to demonstrate suitability as wheelchair accessible homes
 - From the information provided some of the units are of an inadequate size or impractical layout to ensure adequate space to accommodate furniture etc and adequate circulation space
- 2.19 The Council request a clause within the S106 requiring the developer to liaise with the Council's Specialist Occupational Therapist to ensure that the identified homes are constructed to Building Regulation requirements (M4(3)(2)(b)).

Phasing

- 2.20 The development is to be completed in four phases. 139 of the affordable units are to be delivered in Phase 2 (on completion of 52% of the homes) with the remaining 34

(shared ownership) units completed in the last phase. The delivery and timing of the affordable units should be secured in the S106 agreement.

Review mechanisms

- 2.21 By reason of the scheme not meeting the 50% on site affordable housing provision requirement, it is recommended mechanisms are secured within the Section 106 to allow for Affordable Housing Reviews to take account of the values at key stages in the development and when completed, with the aim of enhancing the level and tenure mix of affordable housing to achieve a better level of compliancy with policy objectives. The following reviews are recommended:
1. Early Stage Review
 2. Late Stage Review
 3. Review to assess the impact of Mayoral and Council Housing Capital Grant support to improve the number of affordable units and/or to improve the tenure mix

Housing delivery

- 2.22 The Council's initial response to consultation 1 (Appendix 1) identified the inaccuracies in the GLA's call in letter in relation to housing delivery. Further to those comments, the Council would now like to take the opportunity to provide the following updated figures:
- The results of the 2019 Housing Delivery Test for Richmond showed a total of 1,147 homes delivered in the three-year period 2016/17 to 2019/20 against a 945 homes requirement, a measurement of 121% and therefore no action required.
 - The Council's provisional figures for 2019/20 are 336 completed residential units, exceeding the Local Plan housing target of 315.
- 2.23 The above housing delivery data confirms the Council has not only been meeting its annual housing delivery target in recent years but exceeding that target. Final analysis is still underway on the 2019/2020 figure which will be published in the Council's Authority Monitoring Report. Whilst the Draft London Plan has yet to be adopted and the timetable is unclear, it is anticipated that this will increase the housing target to 411 dwellings per annum, which is deemed to be achievable, and the Council has already consulted on the Direction of Travel for a new Local Plan which is now under preparation. It is noted that the number of affordable units which the Council would want to deliver has been maximised through rigorous and robust assessments of the viability of schemes delivering any net increase in dwellings, which this scheme should now be subjected to in the same way to ensure that the delivery of affordable housing is maximised. Given the scale of this scheme and its importance to the overall delivery pipeline it is hoped that the Mayor would understand the necessity of following the Development Plan in relation to this requirement.

3.0 Design

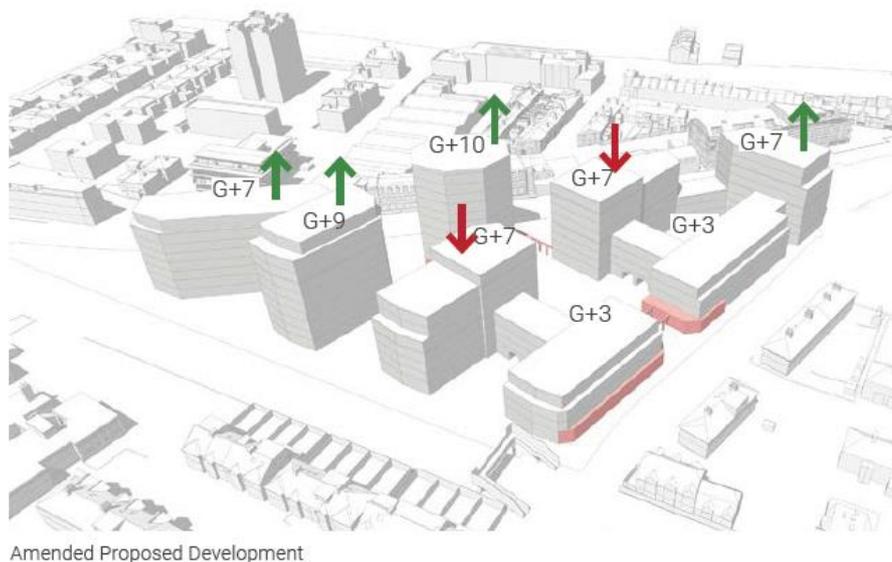
- 3.1 In comparison to the December 2019 scheme, the application proposes:
- a) Variations in height (refer to Table 2)
 - b) Siting – removal of Block E
 - c) General design alterations
 - d) Amendments to the landscaping

Table 2: Amendments to heights

		Original scheme as submitted to LB Richmond	December 2019 scheme	July 2020 scheme
Height	Block A	4-9 storeys	4 – 8 storeys	4 – 8 storeys <ul style="list-style-type: none"> • Core A - increase by 1 storey • Core D – decrease by 1 storey
	Block B	Up to 9 storeys	10 storeys	11 storeys <ul style="list-style-type: none"> • Increase by 2 storeys.
	Block C	6-7 storeys	7-8 storeys	8-10 storeys <ul style="list-style-type: none"> • Core A – increase by 3 storeys • Cores B & C – increase by 1 storey
	Block D	4-9 storeys	4 – 8 storeys	4 – 8 storeys <ul style="list-style-type: none"> • Core B – decrease by 1 storey
	Block E	-----	5 storeys	Omitted

3.2 It is requested the GLA refer to the Planning Committee report (Appendix 2) for policy background, the Borough’s context-led approach to design and tall and taller buildings, and the detailed reasoning as to why the originally submitted scheme was deemed unacceptable. Given the height of this scheme has been adjusted and, in most cases, increased, these published comments remain valid.

Height and mass:



3.3 The reductions in height to Blocks A and D adjacent to the public square are supported and lessen the impact of the development in views along Manor Road. However, the Council refused the scheme largely based on the disjuncture of height with the surrounding context (and within the development site itself), and this objection strongly remains. It is noted that the Draft London Plan requires Council’s to consider carefully the heights of new development against context and to ensure that detailed work is

brought forward making clear what height might be acceptable; this emerging policy should be afforded weight in the decision making process here, yet local context and the harmful impact on that context appears to have been disregarded by the amendments proposed.

- 3.4 Despite the reductions in floor to floor height, which offers some mitigation (although impacts on the future occupiers), the Council's original objection has only been exacerbated by:
- the increase in height to Blocks B and C,
 - adding height to Block B to create a landmark Building (contrary to policy LP2 of the Local Plan);
 - the additional height generated through the 'indicative plant'; and
 - the minimal set back from the southern boundary.

As a result, the scheme has a wholly incompatible, incongruous and overwhelming relationship with the surrounding suburban townscape, in particular:

- The modest two storey terrace properties, designated Buildings of Townscape Merit, in Trinity Road;
 - The existing buildings and two storey Buildings of Townscape Merit within Sheendale Road Conservation Area, located within Dee and Sheendale Road; and
 - The two storey terrace properties in Manor Park to the south.
- 3.5 The above concerns over the height and mass of the development are consistent with the latest advice given by the London Design Review Panel (July 2020) which did not support the increase of massing and 'edging up of height':
- *"The amended views demonstrate an edging up of the height since the November review. The Panel believe that the schemes massing in November was acceptable in terms of its impact on the local context and heritage assets. The Panel recommend that the design team reduce the bulk of the massing where possible. There seems to be scope in the increased number of homes now proposed to accommodate this reduction".*
 - *"The Panel recommend the design team look at reducing the number of units to further to minimise the impact on massing".*
- 3.6 The lack of regard given to the impact of the development on nearby designated and non-designated heritage assets, as required by law, the NPPF and also up to date Development Plans is of grave concern. The Council does not support the assertion made in the Heritage Statement Addendum that the revised scheme will not introduce any additional effect on heritage assets, nor does the Council agree with the following sentence from the Planning Statement,

"The proposed scale, massing and design of the Amended Proposed Development are considered to be acceptable in the Site's context, forming part of a wider urban townscape that does not detract from the setting of the nearby Sheendale Road Conservation Area or Buildings of Townscape Merit. The scale and massing would be fitting within the existing and prevailing context and does not present any detrimental negative impacts upon the character of the Site and surrounding area or the visual amenities of nearby occupants".

It is deemed such statements would not be supported by the latest comments of the London Design Review Panel which are set out above.

Townscape Views

- 3.7 The harm derived from the height is clearly illustrated in the series of the townscape views provided, of which Table 3 provides a summary. In particular:
- View 6, demonstrating the incompatible height, adjacent to the modest two storey Buildings of Townscape Merit in Trinity Road.
 - View 9, showing the sheer massing and scale of the development, out of character to surrounding context.
 - Views 2,10 and 11, showing the overwhelming amount of development on the site and its impact on Manor Road.
 - View 4 and 12, illustrating the wall of development from Dee Road.

Table 3: Review of the Townscape Views

View	Location	Comments
1	Manor Grove	Slight improvement in view due to the part reduction in height of Blocks A and D, although over-scaled Block B is more apparent.
2	Manor Road	The additional heights to Blocks A, D and now Block B, loom over the frontage wings, exacerbating the excessive and incompatible scale and height of the buildings. Block A, in particular, now looks oppressive in the background.
3	Sheen Road	No objection – not visible.
4	Dee Road	The increase in height has worsened the visual impact to the west of the site, with increased height disjuncture (and it is noted that this view is at a distance).
5	Church Road	The scheme shows some variety of heights, and this is far enough away to avoid harm.
6	Trinity Road	This view shows a significantly worse impact. Block B is hugely overbearing and dominates the setting of the modest scale terraces of Buildings of Townscape Merit in the foreground. The increase in height of Block C is also more apparent in the background.
7	Manor Road roundabout	Whilst the amendments result in the development appearing more visually dominant, given this less sensitive view and changes in height, no objections are raised.
8	Sandycombe Road	No objection – not visible
9	Pagoda RBG Kew	Whilst the development may not be on the skyline, by reason of the height, scale and massing, the eye is drawn to it and it therefore negatively dominates this view, and illustrates its excessive and incongruous scale in comparison to local context.
10	North entrance to Manor Road	Represents an abrupt entrance to the site and out of scale with surroundings.
11	Manor Road from south of railway	Scale and massing of the development completely overwhelms site. The higher wings of Block D in the background looks overpowering

		and looms over the frontage wing. The inclusion of ordinary and uniform red brick and 'overheavy' colour of the roof worsens this view.
12	Crown Terrace / Sheendale CA	The additional storeys to Block B and C are starkly apparent: <ul style="list-style-type: none"> • Block B is extremely out of scale and gives a sense of 'looming' over the smaller scale neighbouring buildings on the other side of the railway line. • Block C is now not set back as it was previously, and consequently, the top floor of Block C appears heavier with the change in roof material.

3.8 It is noted that no visualisations have been provided from south of the site (Townshend Terrace area) as previously had been. The Council has significant concerns over the impact of development in relation to the context to the south of the site and it is requested that these views are provided.

Removal of Block E:

3.9 The removal of Block E is welcomed. However, it appears the units that would have been accommodated in Block E have just been distributed elsewhere within the site, achieved through the increased mass and height, which is strongly objected to.

Design and Materials

3.10 The general design refinements; greater contrast of materials; changes to façade treatments to elements of the Manor Road frontage; the increased use of precast stone finishes; and window reveals for Block B are welcomed.

3.11 However, there remains the following objections:

- The top floors appear too 'heavy' visually, exaggerating the roof and, ultimately, the height of the buildings.
- Lack of relief within the buildings. The repetitive and monotonous design only exacerbates the massing and scale of the buildings.
- Manor Road frontage:
 - The design and choice of materials of the mansard roof now has an industrial appearance at odds with the development and, of more concern, the surrounding domestic suburban character.
 - The brick proposed building looks dull and uniform – more variation would be beneficial.

3.12 It is recommended the above objections are addressed, with the top floors of Blocks A, C and D being simplified (especially in relation to the Manor Road frontage building) and set back further to reduce their impact (in addition to a reduction in height).

Landscaping:

3.13 Changes to the landscape scheme are generally positive, including the path realignment; treatment of the public square (including the removal of the pavilion) which now has a more informal arrangement; and the increased planting along Manor Road. The main paving would appear to be granite slabs from the visualisations, which is accepted.

4.0 Living Standards - Internal

4.1 The scheme proposes several amendments in attempt to improve the standard of accommodation:

- Increase in the percentage of dual-aspect dwellings (now 61%) including dual aspect units added to Block C and Block D;
- Changes to floor plates and unit layouts, including to increase the number of dual aspect units and reduce number of oversized units.
- Previous changes made through the December 2019 revisions, including the removal of duplex units from Block C and D; removal of north facing dual aspect units to Block A; and changes to design/layout of Block C to increase the width of courtyard appear to be retained.

4.2 Such amendments are welcomed and, generally speaking, improves the standard of accommodation. Whilst the scheme reduces the floor-to-floor height to 3150mm (internal floor to ceiling height of 2600mm), this does not unreasonably compromise the quality of the proposed accommodation and assists to minimise the impact of the height. Notwithstanding such, the following objections remain:

- Block A: Overlooking to the private rear terraces of the townhouses (within the internal courtyard) from units in the northernmost part of this block (i.e. the third-floor units overlooking the 2nd floor rear terrace to the townhouses). This could be addressed by obscure glazing affected windows (secured by condition)
- Block B: Single aspect units of Block B directly face onto Block D at a distance of only 14.5m.
- Block C: The separation between the northernmost internal units of Block C has increased, however at 11m, this remains inadequate to ensure that there is adequate privacy and no overlooking or perception of overlooking. This significantly affects the west facing single aspect bedrooms within the internal courtyard.

Light:

4.3 The revised Daylight and Sunlight Report appears to state that only a small sample of units has been tested with only 13 out of the 19 rooms (69%) either meeting or exceeding the recommended ADF targets for internal daylight. This still represents a significant number of units failing to comply BRE guidelines with regard to daylight, and it is unclear why such a small sample has been undertaken whereas previous iterations of the Daylight and Sunlight Report assessed a much greater sample size. Clarification should be sought on this point so that the decision maker is clear to what extent the scheme does not accord with the relevant NPPF and development plan policy in this respect

5.0 Play Space / communal space:

5.1 The scheme has made the following amendments to playspace provision:

- Revisions to the child play space strategy to reflect the increased affordable housing provision to accord with the latest GLA Child Play Space Calculator
- Maximisation of play provision for 5-11s at ground level (rather than roof level)

5.2 Under 11 Play: It appears the required level of U11's play space, as per the GLA playspace calculator, is not being fully provided on site (albeit only a small shortfall of 8sqm), another symptom of the overdevelopment of the site. This small shortfall should be made up through on-site provision, otherwise, robust justification will be required

before an off-site contribution is accepted (which would be in addition to the over 12s contributions set out in para 5.4 below).

5.3 Some concerns are raised with regard to the on-site play provisions:

- the scheme proposes a half ball-court in the south west corner of the site. This has previously been considered and the Council maintains its concerns over the safety and appropriateness of its siting within an isolated part of the site where there is little opportunity for natural surveillance.
- The playspace is distributed throughout the site in small areas, which raises questions of the value and usability of such space. Further details are required to demonstrate that such small areas can provide the necessary play equipment provision to cater for the needs of the development.
- Concern over whether the “stepping stone” paths within the play areas bordering the public square, and elsewhere on the site, are genuinely playable space. These were previously described as “play trails” but, given the revised layout of the public square in particular, these could become short cut paths. Careful consideration should be given to the surface treatment to ensure they don’t become general use paths. If these are seen as access routes, they should be excluded from the play space calculations.
- Concern previously was raised with regard to the two play areas on the Residential Street (North) which are poorly-located (adjacent to roadway and parking area) and may be too small to have adequate play features. These two areas are now both smaller, enhancing the concerns, particularly for the split area to the north which needs to be larger to be a good quality playspace.
- Full consideration is needed as to whether the play equipment installed will have sufficient safety clearance space from trees within the smaller play areas, for example the areas identified above and the 17m² space on the south side of the public square. Play features and trees may not work together in these areas and consistency between the landscaping and playspace is essential.

5.4 Over 12 playspace: To serve the development, 245m² of playspace is required for children aged 12 and older and this is to be provided off site. To facilitate this, a section 106 securing a financial contribution towards the provision is required:

- £54,154 on commencement to enhance local play provision;
- £10,045 on occupation (or on commencement with the above if convenient) as a contribution towards play maintenance for a period of five years.

5.5 Accessibility of playspace: On-site play areas should be accessible to all residents. It is recommended a condition be secured setting out the operational policy, accessibility and any site management controls.

5.6 General amenity space: A pathway has been revised/introduced along the southern boundary to provide more direct access to apartments in particular Blocks C and D from Manor Road. This is in itself welcomed and suggests mutual access to these communal areas will be available to the residents of these blocks. Details of the arrangements for the management of these areas to avoid segregated gated communities and to ensure that all residents of these Blocks have access to these areas should be secured via condition / Section 106 agreement.

6.0 Residential Amenity

Visual impact and privacy:

6.1 The Council has previously objected to the development on the grounds of impact on living conditions of surrounding residents. Such objections remain, and are strengthened in response to the increases in height and the proximity of Blocks C and D to the south boundary:

- Block B – This building has increased by 2 floors to 11 storeys, which only worsens the impact upon the neighbours at 2-6 Bardolph Road and Cliveden House. This building, in combination with Block A (8 storeys) and increased height of Block C (now 8-10 storeys) will unreasonably enclose these properties, with very little relief, and have a significantly harmful impact in terms of visual intrusion.
- Block C - A significant increase in height is proposed to Block C, which now extends up to 9 storeys adjacent to the southern boundary and 8 storeys on the western boundary.
 - Cliveden House - Further to the points raised above, Cliveden House has habitable windows on the ground and first floor directly facing the west façade of Block C. These windows appear to serve single aspect bedrooms at a separation of approximately 28m and dual aspect living rooms at a separation of approximately 37m. Notwithstanding the separating distances, the combined height and scale of this block will give an oppressive and dominant appearance, offer little relief and likely appear significantly overbearing for these occupiers.
 - Calvert Court - Despite the separation distance of approx. 40m, given the footprint of this building in combination with its height, the Council fails to see how this building will have anything other than a significantly harmful impact on the residential amenity of neighbours to the south in terms of visual intrusion, overbearing impact and loss of privacy.
- Block D - The height of Block D at the southern boundary appears to remain as per the December 2019 amendments (5 storeys sharply rising to 7 storeys). The Council's position regarding the impact of this building remains. This will have an overbearing and visually intrusive impact and cause undue overlooking to neighbours to the south on Manor Park.
- Block A now extends to 8 storeys in height and is separated by approximately 25m from Falstaff House. For the reasons set out in the committee report, primarily separating distances and orientation, this is not deemed to have an undue impact on these neighbours in terms of visual intrusion and loss of privacy.

Daylight and sunlight Report

6.2 The revised Daylight and Sunlight Report notes that the amended scheme results in a small improvement in the proportion of neighbouring properties that meet VSC (85% - up from 84% from the original scheme) and NSL (95% - up from 93% from the original scheme) guidelines. It is unclear how this result has been reached given the increase in height in comparison to the original scheme. Whilst the improvements are welcomed, the Council remains of the view that the scheme is still likely to have a significant impact through loss of daylight and sunlight to surrounding properties, in particular 1-11 Manor Grove and 1 Victoria Villas with the latter very much being affected by the significant increase in height to Block C since the original submission. Significant concerns are also

raised in relation to 2-6 Bardolph Road and 19-22 Victoria Villas (Cliveden House) given the increase in height to Block B and Block C. Further to this, no information has been submitted to demonstrate that the local environment that the development would impose on neighbouring properties is reflective of the surrounding suburban context.

7.0 Transport

7.1 The principal changes to the scheme are:

- Revised trip generation and multi modal trip generation analysis
- Reconfiguration of car parking spaces
- Cycle parking and bin stores have been relocated to the ground floor of blocks
- Increase in the number of units (+68), with the retained provision of 14 accessible car parking spaces and 2 car club spaces.

Highway and Pedestrian Safety:

7.2 The existing pedestrian refuge crossing point to the south of the development on Manor Road will see an increase of 683 pedestrian trips per 12-hour day as a result of the development. This refuge is 0.8m wide (but is 1.6m wide when the chevrons to the east and west of it are included) giving only enough room on the refuge itself for 1-2 people to stand at a time. This crossing point will see the biggest net increase in pedestrian trips, including an additional 97 pedestrians during the AM weekday peak hour and 55 at the PM weekday peak hour and an additional 683 pedestrians throughout a 12-hour day. This could lead to pedestrian crowding on the footway and refuge and mean that pedestrians cross in unspecified areas, possibly increasing the risk of collisions. In order to maintain pedestrian and highway safety on Manor Road, it is requested that the existing dropped kerbs on the eastern and western footways on Manor Road at this location are improved to include tactile paving and that tactile paving is also included on the refuge itself. This can be secured through a S106 and undertaken via an agreement under S278 of the Highways Act 1980.

Waste and Servicing:

7.3 A dedicated privately maintained service road is provided in the western part of the site, which is a shared space road and has a carriageway width of 4.1m. The access road will serve the parking bays so should be widened, where possible, to 4.8m to allow a car to pass a refuse vehicle or other large vehicle. Further to this:

- Vehicle tracking drawings have been provided in Appendix E in the Transport Assessment which shows a refuse vehicle of 11.125m x 2.5m entering and exiting the site. The extract below shows that the vehicle may overhang the kerb whilst turning. The vehicle tracked is longer than those in Richmond and it is recommended that the manoeuvre is re-tracked using the RCV dimensions set out in the Council's adopted 'Refuse and Recycling Storage Requirements' Supplementary Planning Document, which is a material planning consideration.
- Dropped kerbs must be provided at all relevant points along bin push routes.
- Push routes should be smooth, hard standing and free of any steps / slopes exceeding 1:14.



- 7.4 A total of 51 x 1100L euro bins are proposed for residential usage across the development for storage of '4 days waste output', and therefore the development would require collection twice a week. Suitable and sufficient space must be provided within the bin store of each residential core to provide waste and recycling storage capacity for the Council to collect each waste stream on a once weekly basis only. Therefore, the scheme is contrary to adopted SPD, and again assists in demonstrating the overdevelopment of the site. To meet the standards outlined in the adopted SPD, the scheme should be revised accordingly. Alternatively, a financial contribution towards the uplift in refuse and recycling servicing (in perpetuity) explored. Table 4 identifies the minimum number and type of 1100L euro bins required for each core, based upon the Council's SPD requirement of 70L/bedroom. Given the proposal is for bins to be transported to a single collection point it is essential that additional bin capacity is provided to allow at least 1 x 1100L refuse bin, 1 x 1100L paper and card recycling bin and 1 x 1100L mixed containers bin to remain in the bin stores for use whilst the majority are being emptied. In addition, a proposal that future proofs the development by providing additional space for separate food waste recycling collection would be supported, should this service be expanded to all flats within the borough.

Table 4: Required refuse and recycling requirements

		1 Beds	2 Beds	3 Beds	TOTAL	Refuse (1100L)	Paper and Card recycling (1100L)	Mixed containers recycling (1100L)
Block A	Core A	5	40		45	5	2	2
	Core B	3	14	1	18	2	1	1
	Core C	10	8	4	22	2	1	1
	Core D	36	21	11	68	7	3	3
Block B	Core A	21	41		62	7	3	3
Block C	Core A	46	27		73	6	3	3
	Core B	2	27	6	35	5	2	2
	Core C	8	14	9	31	4	2	2
Block D	Core A	8	20		28	3	2	2
	Core B	34	34		68	6	3	3
TOTAL						47	22	22
							91	

7.5 The proposal is for waste to be stored at ground floor level within each block and transferred to a 'main refuse storage area' by facilities management on collection day. The main collection area is shown in Appendix A of the Revised Waste Management Plan. However no firm details on how many bins it can hold are given, and there are concerns it will not be able to accommodate the necessary amount. All bins / bulky items stored within the collection area must be freely accessible by our collectors without first having to move bins of another waste stream first. An illustrated plan showing the arrangement of space within the collection area would be beneficial.

7.6 No details have been provided for bulky waste storage. The Council's SPD requires larger developments, such as this, to consider provision of a hard-standing area for bulky waste awaiting collection. This is essential to reduce risk of bulky waste from the development being dumped on nearby highways.

Controlled Parking Zone

7.7 Given the increase in units, the scheme essentially being car free, and the potential overspill of up to 451 vehicles (resulting from the development) on surrounding streets, it is vital that the sum of £100,000 is secured through the S106 agreement for CPZ review and implementation, and paid prior to the commencement of development. It is also essential that future occupiers of the development are precluded from purchasing vehicular parking permits within any existing or future controlled parking zones within the Borough of Richmond, without which it will not be possible to mitigate the effect of overspill on-street vehicular parking from the development to an acceptable degree in accordance with Para. 108c of the National Planning Policy Framework (NPPF). This should be addressed in the Section 106 agreement.

Disabled parking bays

7.8 Accessible car spaces are proposed for 3% of the units (14 spaces). It is unclear as to how suitably located these are for the Wheelchair User Homes. The Design and Access Statement - Landscape Addendum 02, states the design of the scheme allows for future expansion of the accessible car parking provision to 10% of the units (30 additional

spaces) to comply with the London Plan. However, the Council has the following objections to the indicative 10% car parking provision:

- the loss of outside amenity space / landscaping
- the loss of short-term cycle space.

7.9 The development must cater for the needs of the development. The failure to do so, and the need to utilise other valuable outside space (where there is already a short fall of playspace) again shows to demonstrate that this proposal represents a gross overdevelopment of the site.

Cycle parking:

7.10 Whilst the scheme provides London Plan compliant cycle parking, the recently adopted LBRuT Air Quality SPD sets a requirement for developments to demonstrate how cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people and the carriage of children. It is requested the scheme is amended to reflect such as the SPD is a material planning consideration.

Car Clubs:

7.11 The Air Quality SPD sets a car club requirement of 1 car club bay per 25 dwellings, unless acceptable grounds can be given for alternative numbers. Whilst 18 car clubs bays may well be excessive, justification should be provided as to why this provision could not be made within the development and the Council would welcome exploring whether further car club bays could be provided on the site without being to the detriment of the scheme's design, public realm and soft landscaping.

7.12 Section 106 legal agreement and Section 38 and Section 278 works

- All Heads of Terms referred to in this response need to be secured in any future Section 106 Legal Agreement.
- All financial contributions set out in the planning committee report should be secured through a S106 legal agreement (unless amended through consultee discussions as set out in 13.13 and 13.14 of the Transport Assessment).
- In addition to the pedestrian refuge works listed above, all other highway works set out in the planning committee report should be secured through a S106 legal agreement and implemented through a S38 / S278 Highways Agreements.

8.0 Energy

8.1 The revised scheme has made amendments to the site-wide energy strategy, increased PV provision and provided new information.

8.2 The revised Energy Report indicates that greater carbon reductions are now being achieved, including an increase in overall CO2 reductions to 45.7% and Be Lean reduction of over 10% (as per the Draft London Plan). A carbon offset payment should be secured through the S106 legal agreement.

8.3 It is noted that space allocation has now been made for the introduction of a single connection point to the site to facilitate a connection to the district energy network should this become available in the future. It is also proposed to include full trenching between all buildings, with space allocation made for future district heating pipework. This is welcomed.

9.0 Noise Pollution:

- 9.1 The proposals now include a half ball-court in the south west corner of the site. The Revised Noise and Vibration Impact Assessment (Revision 08 – 29 July 2020) shows the proposed location, from Figure 7, falls within the 65 to 70 dB contour with general mitigation in the form of a solid boundary treatment along the boundaries proposed. However, given the proposed use as a ball court, further measures may now be needed to mitigate additional noise generated from the use of the half ball-court for occupiers of the development, secured through a noise condition.

10.0 Trees

- 10.1 The more informal approach to the landscaping scheme and the associated increase in tree planting from 113 to 141 trees is welcomed. This increase is considered to be a suitable gain in tree cover to offset the loss of existing trees. However, concerns remain over the species selection for street trees, namely the Gleditsia, and the size of the tree planting pits in respect of the required soil volume calculations which are based on a mature crown spread of 5m and not 8m as one would expect for Gleditsia triacanthos and Acer freemanii. It is thereby recommended the following conditions are secured:
- Tree planting scheme, to include a more detailed plan showing species and size of tree to be planted
 - A 5-year maintenance plan.
 - Replacement tree planting should any tree failure within 5 years of planting
 - Details of hard and soft landscaping.
 - Any trees planted within the highway boundary will incur a commuted sum for maintenance, secured via a Section 106 Legal Agreement.

11.0 Ecology

- 11.1 The extent of soft landscaping appears to have been reduced with an urban greening factor of 0.320 now proposed, reduced from 0.347. This falls significantly short of the required urban greening factor of 0.4 (in conflict with D5 of the Draft London Plan which is a material planning consideration afforded significant weight). Further to that set out in the Committee report, a biodiversity strategy and management plan should be secured for the development, including actions from the London and Richmond Biodiversity Action Plans, with a rolling 5-year management plan in perpetuity.

12.0 Impact on local infrastructure:

Education

- 12.1 Applying the Council's formula, the scheme would produce a pupil yield of 63 primary-phase and 30 secondary-phase children. The overall position set out in the committee report remains valid, which is, secondary school capacity in the eastern part of the Borough is dependent on a new school being provided as part of the redevelopment of the Stag brewery site (currently under consideration by the Greater London Authority). If approved, this would provide enough capacity for the development hereby under consideration. However, a decision has yet to be made, and in its absence, there are concerns whether the education need arising from the development can be met, especially given:
- the increased pupil yield in comparison to the original scheme.

- the Borough's forecast need for secondary school places has increased since the Council made its decision on the original scheme.
- the continued uncertainty over the delivery of a new secondary school which would be needed to accommodate the additional capacity resulting from the development

12.2 Whilst the Council would not object on such grounds, the increased educational need and the continued uncertainty over the delivery of a new secondary school are important material considerations.

Health:

12.3 Based on the amended housing numbers and mix, as set out in the Planning Statement Addendum (July 2020), and applying the HUDU Planning Contributions Model, a financial contribution of £193,500, is required towards primary healthcare needs arising from the development, to be secured through a S106 legal agreement. In the absence of such, the development would have an unacceptable pressure and impact on health services.

13.0 Environmental Impact Assessment

13.1 Following a request from the applicant for a formal EIA Screening Opinion, on 14 December 2018 the Council issued a Negative Screening Opinion confirming that the development did not require an Environmental Impact Assessment (EIA) to be submitted as part of the planning application. It is understood that the applicant has requested a further EIA screening opinion based on the most recent scheme, however, an Opinion has yet to be issued.

13.2 The Council's screening opinion was based on the assumption of approximately 400 dwellings with buildings ranging from 4 to 9 storeys:

- 4-5 storeys along Manor Road
- 4-6 storeys along the south boundary
- 3, 6, 7, 9 storeys along west boundary

13.3 When considering the 'size and design of the whole development', the Council considered the surrounding built environment context and made its assessment based on "the varied heights within the development, with lower heights long Manor Road and the south boundary". Whilst an additional 53 units broadly fits within the context of the Council's EIA screening decision, the adjustment and increase in height and mass across the site is not insignificant and will have significantly greater townscape effects than originally considered, especially given the proximity of heritage assets (as set out in the Council's screening decision letter).

13.4 The Council therefore requests that this matter is given full consideration, along with all other matters set out in Schedule 3 of the EIA Regulations, when issuing EIA screening decision.

14.0 Summary

14.1 The Council acknowledges the priorities of the Mayor and Greater London Authority in pursuing development outcomes for the benefit of Greater London Region, with respect to housing delivery. The Council has positive evidence of a five-year housing land supply and the results of the 2019 Housing Delivery Test for Richmond showed 1,147 homes delivery 2016/17 to 2019/20 against a requirement of 945, a measurement of 121%. It is acknowledged that the Draft London Plan is set to

increase Richmond's housing target to 411 and the Council will work proactively to achieve this annual requirement, including through the preparation of a new Local Plan.

- 14.2 The Council recognises that affordability of housing is an acute issue in the Borough and also the challenges in delivering affordable housing to meet Borough needs. The Council is committed to increasing affordable housing delivery through various channels, as set out in the recent Draft Housing and Homelessness Strategy (reported to the Council's [Adult, Social Services, Health and Housing Committee](#) in February 2020). This commitment is clear from the Council's own local plan policy to secure affordable housing from any net increase in homes, recognising the contribution that small sites play to delivery of homes in the borough, and the consequent importance of ensuring that large sites such as this deliver the maximum amount of affordable housing which can be justified through a rigorous and robust review of scheme viability, as should now be required for this scheme.
- 14.3 The Council is also committed to making the most efficient use of sustainably located brownfield land (in accordance with the NPPF), however, that is not to say that the plan-led system should not be followed (para 47 of the NPPF) or that development should come wholly at the expense of other material considerations, in this case to the detriment of the local character and context, to the detriment of designated and non-designated heritage assets, residential amenity and to meeting specific local priority needs. A planning balance needs to be applied which has proper regard to the requirements set out in the NPPF and in law.
- 14.4 In terms of design, the NPPF sets out:
- *Design policies should be developed with local communities, so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics.*
 - *Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents.*
- 14.5 The Local Plan, adopted in 2018, clearly sets out the vision for building height, stating new buildings should respect and strengthen the setting of the borough's valued townscapes and landscapes, through appropriate building heights and respect the local context, through appropriate scale, height and mass (LP2). Further, the borough-wide Sustainable Urban Development Study identifies that higher density development would only be appropriate in the main centres, with tall and taller buildings clustered close to Richmond and Twickenham Centres. And, elsewhere taller or tall buildings likely to be inappropriate and out of character with its historic context and local distinctiveness. Finally, the Council adopted Village Planning Guidance SPDs that provide area character assessments. Notably, it states, The Towers, which is located to the northwest of the site and 11 storeys in height, disrupts the otherwise legible street gird.
- 14.6 The scheme has now been through two Richmond Design Review Panels – refer to Appendix 3 (where the maximum height was 9 storeys) and the panel consistently raised concerns over the relationship with the local character; the height being overly ambitious; the proposals being more reminiscent of an urban typology that sits within a suburban low scale context; and lack of exceptional design to justify the height. Since then, the height and massing has been adjusted (largely increased) and the Council fails to see how the scheme is based on a detailed appraisal or is sympathetic to the

local context (notably the domestic, suburban context of the wider area) or that adequate justification has been provided to justify such a scheme. Nor can the Council comprehend how the scheme complies with policies D3 and D9 of The London Plan: Intend to Publish:

- *D3: Development proposals should enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions;*
- *D9: Where the edges of the site are adjacent to buildings of significantly lower height.....there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy.*

14.7 Therefore, whilst the housing, and indeed the affordable housing contribution this scheme would deliver is realised, given the current housing delivery performance of the Borough, the housing benefits of this scheme are not deemed to outweigh the clear and apparent harm that derives from the excessive height and scale of this development, which is completely out of context with local character. For the reasons set out in the Planning Committee report, the Council’s letter in response to December 2019 revisions; this letter (and as summarised in the table 5 below), the proposal is not considered compliant with the Development Plan in a significant number of instances and it is not the case that there are material considerations that would indicate an alternative decision; therefore the Borough strongly **objects** to the application:

Table 5: Summary of comments

<p>Affordable housing</p>	<p>Objection remains:</p> <ol style="list-style-type: none"> 1. The proposal falls short of the 50% on site provision (LP 36). 2. Fails to comply with either the Mayoral or Richmond policy on affordable housing mix (thus not compliant with the Fast Track approach). 3. Lack of viability information to demonstrate that the maximum reasonable provision of affordable housing is being delivered. 4. Further modelling required to confirm that the overall number and proposed affordable mix provides the optimum level and tenure mix of affordable homes and, given the Council’s priority need is for family accommodation, whether adjustments to the tenure mix could bring about an increase in family homes. 5. Lack of Wheelchair accessible homes across all tenures. 6. Shared ownership units do not meet the Boroughs affordability criteria (two thirds being affordable at household incomes not exceeding £47,000) 7. The London Living Rent homes would be at more than 90% of market rent. 8. Matters to be resolved through the S106: <ul style="list-style-type: none"> • Quantum, tenure and mix, affordability • Phasing and delivery • Review mechanisms • Service charge to be captured within the Boroughs affordability threshold • Marketing to those living or working in the borough of Richmond in housing need. • To consider uplift (or adjustment of tenure mix) through potential of Mayoral grant together with the Council’s Housing Capital Programme funding. • Wheelchair accessible homes across tenure
<p>Housing</p>	<ol style="list-style-type: none"> 1. GLAs call in letter contained inaccuracies.
<p>Design and landscaping</p>	<p>Despite some improvements, the reasons for refusal set out in the committee report have not been overcome.</p>

	<ol style="list-style-type: none"> 1. Height: Given the increase in height across the site, previous objections remain, in particular the relationship with the surrounding domestic suburban townscape (Manor Road; Trinity Road, Dee Road) 2. Design and materials: Top floor of Blocks A, C and D appears 'heavy' and further refinements needed to the choice of materials.
Residential amenity	<p>Objections and reason for refusal previously made remain valid.</p> <ol style="list-style-type: none"> 1. The increase in height to Blocks C and D exacerbates the impact on the amenity of neighbours to the south on Manor Park and Calvert Court – overbearing, visually intrusive and overlooking 2. Block B: The increase in height only worsens the impact on residents to the west of the site (in combination with Block C and Block D) to the detriment of their amenity. 3. Concerns remain over the impact on Cliveden House. 4. Lack of information of light – whether the proposed relationship is reflective of the surrounding context.
Living standards	<p>Whilst some concerns have been addressed, objections (and new objections) remain:</p> <ol style="list-style-type: none"> 1. Overlooking issues 2. Separation between units within Block C 3. Single aspect units of Block B facing Block D 4. Levels of light
Energy	<ol style="list-style-type: none"> 1. Improvements to CO2 reductions noted and it is expected that the GLA will fully explore whether the concerns raised at the Stage 1 stage have been fully addressed and that, overall, the development is in accordance with the Energy Hierarchy and achieves the highest standard of construction. 2. The required carbon offset contributions are to be secured through a S106 agreement.
Legal agreements and conditions	<ol style="list-style-type: none"> 1. S106 Legal Agreement: It is acknowledged that the heads of terms referred to within the committee report (Appendix 2) is forming the basis of a draft Section 106 agreement. The applicant has stated that this will be in an agreed position prior to the public hearing and it is expected that LBRuT officers will be involved in this process of agreeing the legal agreement. The Borough will provide comment on this in separate correspondence. However, all planning obligations outlined in the original Committee Report remain valid. 2. Conditions: The necessary conditions outlined in the original committee report and this letter should be carried forward to decisions if a positive recommendation is given.
Land use	<ol style="list-style-type: none"> 1. No objection
Playspace	<ol style="list-style-type: none"> 1. Further details required on play facilities 2. On-site requirements for U11s are not being met – justification required <p>Section 106 / conditions:</p> <ul style="list-style-type: none"> • Operation policy required • Contribution to offset uplift at local parks
Transport	<ol style="list-style-type: none"> 1. Necessary amendments: <ul style="list-style-type: none"> • Waste and servicing details • Increase in refuse and recycling storage

	<ul style="list-style-type: none"> • Clarity on future provision of disabled bays <p>2. Necessary Heads of Terms:</p> <ul style="list-style-type: none"> • Highway works required to pedestrian refuge • CPZ contribution required • Removal of car parking permits • Various financial contributions • S38 and S278 works • Contribution towards uplift in servicing
Ecology	1. Urban greening factor requirements are not being met
Trees	<p>1. Concern over suitability of street planting</p> <p>2. Further details of planting and landscaping (including a Tree Planting Scheme) should be secured by conditions.</p>
Air quality & Noise	1. Requirements of recently adopted Air Quality SPD should be met
Education	1. Changes to the scheme, the increased educational need and the continued uncertainty over the delivery of a new secondary school are important material considerations.
Health	1. A financial contribution of £193,500, is required towards primary healthcare

Should you have any questions regarding anything raised in this letter, do not hesitate to contact Lucy Thatcher via telephone (020 8 891 7691) or email (Lucy.Thatcher@richmondandwandsworth.gov.uk)

Yours Sincerely,



Jenifer Jackson
Assistant Director of Environment & Community Services (Planning and Transport)

Enclosed.

- *Appendix 1: LBRuT Response to 2019 revisions*
- *Appendix 2: Committee Report and Planning Committee minutes - 3 July 2019*
- *Appendix 3: Design Review Panel Comments*

From: BCTAdmin@thameswater.co.uk
Sent: 13/December/2021 09:02 (GMT)
To: planning@richmond.gov.uk
Subject: 3rd Party Planning Application - 19/0510/FUL - NOV 2021

London Borough of Richmond upon Thames
Environmental Protection and Customer Services
Civic Centre, 44 York Street
Twickenham
Middlesex
TW1 3BZ -

Our DTS Ref: 53531
Your Ref: 19/0510/FUL - NOV 2021

13 December 2021

Dear Sir/Madam

Re: HOUSEBASE 84, MANOR ROAD, RICHMOND, TW9 1TF

Waste Comments

With the information provided Thames Water has been unable to determine the waste water infrastructure needs of this application. Thames Water has contacted the developer in an attempt to obtain this information and agree a position for SURFACE WATER drainage, but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. "No development shall be occupied until confirmation has been provided that either:- 1. Surface water capacity exists off site to serve the development or 2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Or 3. All Surface water network upgrades required to accommodate the additional flows from the development have been completed. Reason - Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

Thames Water would advise that with regard to FOUL WATER sewerage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

Water Comments

Thames Water are currently working with the developer of application 19/0510/FUL to identify and deliver the off site water infrastructure needs to serve the development. Thames Water have identified that some capacity exists within the water network to serve 99 dwellings but beyond that upgrades to the water network will be required. Works are on going to understand this in more detail and as such Thames Water feel it would be prudent for an appropriately worded planning condition to be attached to any approval to ensure development doesn't outpace the delivery of essential infrastructure. There shall be no occupation beyond the 99 dwelling until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or- a development and infrastructure phasing plan has been agreed with Thames Water to allow additional development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation of those additional dwellings shall take place

other than in accordance with the agreed development and infrastructure phasing plan. Reason - The development may lead to low / no water pressures and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development. Any necessary reinforcement works will be necessary in order to avoid low / no water pressure issues."Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.

<https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdevelopers.thameswater.co.uk%2FDeveloping-a-large-site%2FPlanning-your-development%2FWorking-near-or-diverting-our-pipes&data=04%7C01%7CNetcall159r%40richmondandwandsworth.gov.uk%7C24da969ea9cc4f7d3e5008d9be1740b6%7Cd9d3f5acf80349be949f14a7074d74a7%7C0%7C0%7C637749829345448110%7CUnknown%7CTWFpbGZsb3d8eyJWIjojMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6IklhaWwiLCJXVCI6Mn0%3D%7C3000&sdata=OGq45UMVEO%2B1Wqg6n1OASvhPZZ%2B%2FWgczu%2BAxcli7FQ4%3D&reserved=0>

The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

<https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdevelopers.thameswater.co.uk%2FDeveloping-a-large-site%2FPlanning-your-development%2FWorking-near-or-diverting-our-pipes&data=04%7C01%7CNetcall159r%40richmondandwandsworth.gov.uk%7C24da969ea9cc4f7d3e5008d9be1740b6%7Cd9d3f5acf80349be949f14a7074d74a7%7C0%7C0%7C637749829345448110%7CUnknown%7CTWFpbGZsb3d8eyJWIjojMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6IklhaWwiLCJXVCI6Mn0%3D%7C3000&sdata=OGq45UMVEO%2B1Wqg6n1OASvhPZZ%2B%2FWgczu%2BAxcli7FQ4%3D&reserved=0>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

Supplementary Comments

Thames Water advise that as the site currently drains via infiltration, we are unable to fully assess the site for a sewer connection prior to completion of infiltration tests. Once infiltration tests are complete Thames Water will be able to assess the capacity requirements of this site.

Yours faithfully
Development Planning Department

Development Planning,
Thames Water,
Maple Lodge STW,
Denham Way,
Rickmansworth,
WD3 9SQ
[Tel:020 3577 9998](tel:02035779998)

Email: devcon.team@thameswater.co.uk

This is an automated email, please do not reply to the sender. If you wish to reply to this email, send to

devcon.team@thameswater.co.uk

Visit us online

<https://eur01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.thameswater.co.uk%2F&data=04%7C01%7CNetcall159r%40richmondandwandsworth.gov.uk%7C24da969ea9cc4f7d3e5008d9be1740b6%7Cd9d3f5acf80349be949f14a7074d74a7%7C0%7C0%7C637749829345448110%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6IklhaWwiLCJXVCI6Mn0%3D%7C3000&sdata=EbvKTFqEpdzJ5Azm4%2BcLM2ZeqKJQ2tRbCdilOs%2Fte54%3D&reserved=0> , follow us

on twitter

<https://eur01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.twitter.com%2Fthameswater&data=04%7C01%7CNetcall159r%40richmondandwandsworth.gov.uk%7C24da969ea9cc4f7d3e5008d9be1740b6%7Cd9d3f5acf80349be949f14a7074d74a7%7C0%7C0%7C637749829345448110%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6IklhaWwiLCJXVCI6Mn0%3D%7C3000&sdata=OtWnJ%2BAMwIvGMoW4P6fsYli%2FDAFFbbk%2BYMM%2BjNXjOAc%3D&reserved=0> or

find us on

<https://eur01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.facebook.com%2Fthameswater&data=04%7C01%7CNetcall159r%40richmondandwandsworth.gov.uk%7C24da969ea9cc4f7d3e5008d9be1740b6%7Cd9d3f5acf80349be949f14a7074d74a7%7C0%7C0%7C637749829345448110%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6IklhaWwiLCJXVCI6Mn0%3D%7C3000&sdata=m%2BLtI%2FFPK%2BlDqZ%2Fq7FrgPzznpQa0yzOK6iBVoskZkGA%3D&reserved=0>.

We're happy to help you 24/7.

Thames Water Limited (company number 2366623) and Thames Water Utilities Limited (company number 2366661) are companies registered in England and Wales, both are registered at Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB. This email is confidential and is intended only for the use of the person it was sent to. Any views or opinions in this email are those of the author and don't necessarily represent those of Thames Water Limited or its subsidiaries. If you aren't the intended recipient of this email, please don't copy, use, forward or disclose its contents to any other person - please destroy and delete the message and any attachments from your system.