



## HOUSE OF COMMONS

LONDON SW1A 0AA

The Rt Hon Michael Gove MP  
Secretary of State for Housing, Communities and Local Government  
Ministry of Housing, Communities and Local Government  
Fry Building  
2 Marsham Street  
London  
SW1P 4DF

Our Ref: SO0825

17 September 2021

Dear Michael,

**Re: Homebase, Manor Road application (GLA ref: 4795)**

Congratulations on your appointment as Secretary of State for Housing, Communities and Local Government.

I am writing to request that you call in the Homebase, Manor Road application (GLA ref: GLA4795), which the Mayor of London, Sadiq Khan, is currently re-assessing having originally signaled his intention to grant approval, in October 2020.

I understand that you intend to review the Government's planning policies, so this would seem an appropriate moment for you to reconsider your predecessor, Robert Jenrick's decision not to call in this application, when I requested this, in September 2020.

Mayor Khan called in the original application following the London Borough of Richmond upon Thames' (LBRUT) decision to refuse planning permission, in 2019. This indicates the proposals are of regional significance and so qualify for your consideration.

I understand there is a pressing need for more homes to be built, and I am supportive of new flats being created at the Homebase, Manor Road site. However, I am deeply concerned by the proposals put forward by developer Avanton, because they will have a detrimental effect on the site and surrounding area that puts them into conflict with the National Planning Policy Framework (NPPF) and Richmond's Local Plan (LP).

By reason of its siting, layout, height, scale, bulk, design and materials, application GLA4795 represents a visually intrusive, overbearing and unneighbourly form of overdevelopment. Its incongruous design will have a detrimental impact on the character of the site and surrounding area, which breaches policy 12 of the National Planning Policy Framework (NPPF) and policies LP1, LP2, LP3, LP4, LP6 and LP8 of the Local Plan. I also believe insufficient public transport accessibility means it breaches NPPF policy 9.

NPPF policy 12 on *Achieving Well-Designed Places* says "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 supplementary planning documents such as design guides and codes."

Avanton's proposals fail NPPF policy and Local Plan policies on design in multiple ways:

The design of the four blocks makes minimal references to the local context, their monotonous style exacerbating the bulky, overwhelmingly dominant nature of the development overall, contrary to policy LP 2 which states “any proposals for a tall or taller building should make a positive contribution to the existing townscape, character and local distinctiveness of the area”.

Not only is the site not within an area identified for tall or taller buildings, but the scheme fails to demonstrate a thorough understanding of the character and built form of the immediate surrounding vicinity. In essence, the developers are attempting to shoehorn an urban style development into a suburban district, which means their plans are at odds with LP1 (protecting an area’s character).

Avanton envisages having eight storey apartment blocks overlook two storey houses and their gardens on the southern side (2-20 Manor Park) and an eleven-storey tower block and other buildings overlook existing five-storey apartments on the western side (2-6 Bardolph Road and Cliveden House). By enclosing its neighbours in this way, the development will be oppressive and overwhelming. In addition, Avanton’s proposed new blocks will appear to reduce daylight for neighbouring properties, which breaches LP8 (protection of residents’ amenity and living conditions).

I believe insufficient information has been provided by the developer to prove light levels in the immediate and wider local vicinity will not be affected by the height and mass of their proposed development.

If built, the eleven-storey building at the centre of the site will be dominant and intrusive, creating a looming presence, especially from Manor Grove, Manor Road, Trinity Road and Dee Road. In addition, there are concerns that this building would be visible from the Royal Botanic Gardens, Kew, which are a UNESCO World Heritage Site with special planning protections in place, including safeguarding against possible visual intrusion by tall structures in surrounding areas, encompassed in LP6.

Furthermore, the London Plan states “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.” In other words, LBRUT’s decision not to allow tall buildings to be sited at this location should be allowed to stand.

The site is within close proximity to designated heritage assets (Sheendale Road Conservation Area) and non-designated heritage assets, the Buildings of Townscape Merit (BTMs) on Manor Road and Trinity Road. The height, scale, mass and uniform design of the development would result in an imposing presence and a harmful visual impact on these heritage assets, ultimately resulting in harm to their setting in conflict with the NPPF and LP 3 (protection of designated heritage assets) and LP 4 (protection of non-designated heritage assets) of the Local Plan.

Furthermore, the NPPF requires, “in assessing applications, local planning authorities should have regard to the outcome from these processes, including any recommendations made by design review panels”.

While I note Avanton has cooperated with the Mayor of London’s design review panel, the developer paid no heed to the design review panel convened by Richmond Council. Richmond’s design review panel raised a number of concerns about this scheme, none of which were addressed by the developer, meaning these issues remain relevant and unresolved. That means the application breaches the NPPF.

In addition, the developer has not taken into account the objections raised by 770 local residents and residents' societies to their original, but largely similar proposals. This means the application contravenes the NPPF, which states: "Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot."

Following Richmond Council's decision to refuse the application in June 2019, the Mayor of London called in Avanton's application in July 2019, since when the scheme's proposed height, mass and consequent overbearing nature have grown, making it even more unreasonable and unacceptable.

The scheme fails paragraph 104b NPPF policy 9 on *Promoting Sustainable Transport* which states existing or proposed local transport infrastructure should be sufficient to accommodate a proposed new development. Unfortunately, Transport for London's cuts to three local bus services means the site is not sufficiently served by public transport. Worse, South Western Railways has announced proposals to cut services from North Sheen station, the nearest local station, which will reduce public transport accessibility levels even further if realised, I believe.

In addition, the transport sustainability of Avanton's application is undermined by accessibility problems at North Sheen Station. The platforms can only be reached by a bridge, which makes it inaccessible to many disabled people who may not be able to use its steps. This breaches paragraph 112c of NPPF policy 9.

According to the NPPF, permission should be granted unless any adverse impacts of doing so would 'significantly and demonstrably' outweigh the benefits, when assessed against policy. In this instance, the harm identified above outweighs the benefits, so I request you to call in this application, so a decision can be made to refuse.

Yours sincerely

A handwritten signature in cursive script, reading "Sarah Olney".

Sarah Olney  
Member of Parliament for Richmond Park