

Response to Planning application 25/0010/FUL

The Kew Society objects to this planning application primarily on the grounds of the excessive height and the external design of the two additional proposed floors, which would be wholly inappropriate in an area of predominantly low-rise buildings and immediately adjacent to the Kew Gardens Conservation Area.

The proposal is to add an additional two floors to the building, taking it from six to eight floors. The external design of the new floors, with its quartz/zinc finish, fails to blend in with the rest of the building and is totally out of keeping with the surrounding townscape. On both counts this contravenes the Richmond Local Plan.

- The London Plan Policy D9 (B3) states *'Tall buildings [those over six storeys] should only be developed in locations that are identified as suitable in Development Plans'*. Sandycombe Road has not been identified as suitable for Tall Buildings.
- The current Richmond Local Plan states (Policy LP2, paragraph 4.2.2) that tall buildings *'would only be appropriate in the main centres'*, and then goes on to state where those main centres are (Sandycombe Road is not one of them).
- The Regulation 19 Publication Version of the draft new Richmond plan dated June 2023 - a material consideration in the context of this application - states (Policy 45) that *'Buildings which are 7 storeys or over, or 21 metres or more from the ground level to the top of the building (whichever is lower) will be considered to be tall buildings'* and that *'Proposals for tall buildings will only be appropriate in Tall Building Zones identified on the Policies Map and in Appendix 3'*.
- Appendix 3 of the draft Plan does not identify Sandycombe Road as a Tall Building Zone.
- Policy 45 of the draft Plan also states that *'Proposals will be required to meet the requirements of Policy 44 'Design Process' and Policy 28 'Local Character and Design Quality (Strategic Policy)'*. The proposed design of the new floors fails to meet these requirements as the external design in particular, with its zinc/quartz facades, will be totally out of character with both the rest of the building and the surrounding townscape.
- For the same reason, the design does not conform to the 2023 Urban Design Study referenced in the draft Plan.
- The building is not in a conservation area but is within a few metres of the edge of the Kew Gardens Conservation Area. The additional height and design will adversely affect the setting of the Conservation Area.

The quality of the information and analysis of the scheme provided with the planning application - essentially the cursory Planning Statement - is very poor and provides no comment on the additional height and design in the context of planning regulations. In particular:

- The caption to the first photo on page 2 states '*Purpose built property would benefit from modernising with two additional residential floors – as the building is starting to look dated*'. The building may look dated but the proposed design of the 'modernising' is inappropriate for the current building, failing to blend in with the current design.
- The sole reference to planning policy in this Statement is in the last, short paragraph, including: '*The Greater London Authority (GLA) is currently developing a London Plan, which will be a blueprint for future development in London. The plan aims to address the housing crisis, deliver sustainable economic growth. The London Plan will need to deliver these policy changes holistically – by increasing density, supporting more tall buildings.*' These are very general comments with no reference to specific planning guidelines on building height, design, environmental sustainability etc; the last sentence 'The London Plan will need to deliver...' is in our view irrelevant in the context of a Planning Statement, which should demonstrate how the proposed development is compliant with the relevant policies and guidelines, including Local Plans.

We therefore recommend strongly that this application be refused.