

Planning Application Submission - February 2014

# Planning Statement

Consultant: Turley Associates

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Latchmere House – Scheme 2



# Planning Statement

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Latchmere House  
Scheme 2

Berkeley Homes (Central  
London) Ltd

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February 2014

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## **Appendices**

Appendix 1 – Planning obligation Heads of Terms

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## Executive Summary

1. Turley Associates has been instructed to provide planning consultancy advice in relation to the proposal by Berkeley Homes (Central London) Ltd for an 89 unit residential development at the Latchmere House former Remand Centre site, situated in the London Borough of Richmond upon Thames and the Royal Borough of Kingston upon Thames.
2. Given that the site is within LBR and RBK the proposals have been submitted as two separate planning applications. This report takes a whole-site view of the development but assesses the proposals against relevant policies within both boroughs.
3. A planning application for an alternative proposal for the site has also been submitted (Scheme 1). Scheme 1 takes a different approach to the quantum of development and the provision of affordable housing.
4. The site is located within a predominantly low-density suburban residential area, featuring semi-detached properties, as well as terraces, detached properties and some apartment blocks. The site is partly covered by the Ham Common Conservation Area (within LBR) and Latchmere House itself is considered to be a Building of Townscape Merit within the conservation area. There are number of protected and mature trees on the site and the site lies adjacent to the Ham Common area of Metropolitan Open Land.
5. Substantial pre-application engagement has been undertaken by the applicants, with local residents, Members and officers of both councils. The two proposed approaches to developing the site are a response to the results of this pre-application engagement.
6. The proposals comprise 55 new houses, 27 new apartments and 7 apartments created by the conversion of Latchmere House. 34 affordable units will be provided including 7 houses.
7. The principle of residential use on the site is acceptable and indeed encouraged by planning policies, which seek to meet and exceed adopted housing targets. This has not been achieved by either borough in recent years. The adopted Planning Brief envisages a residential-led development and the provision of new homes is a key national planning policy. There is no policy protection of the previous remand centre use.
8. The proposals respond well to the local context of the site, which is defined by low-density suburban housing estates, but with some apartment buildings in the area, substantial areas of open space and trees and the character of the conservation area and Building of Townscape Merit. The site's existing condition is also a relevant consideration, with a large number of the buildings and the substantial areas of hardstanding having a negative impact on the conservation area. It is a key part of the Vision set out with the site Planning Brief that the proposed development should respond positively to the site context and to positive features of the site itself.
9. The masterplan has been laid so that Latchmere House will be the focal point of the site, whilst also responding to the pattern of surrounding residential plots by ensuring proposed rear gardens back onto existing rear gardens where possible. This achieves a good relationship to neighbouring properties, with regards to amenity and urban form. The masterplan also retains substantial areas of open space and the majority of existing trees of landscape/biodiversity value.
10. The proposed buildings will be two-three storey, including a number of properties that will utilise the roof space to provide sensitive additional accommodation. This design approach limits the overall height of the units and also utilises roof space in a planned manner, avoiding the potential for ad hoc roof extensions in the future. There will be a

good variety of building storey-heights and roof profiles, all within or below a maximum height of three storeys; this produces visual interest and differentiation between units. The apartment buildings will be two-three storeys in accordance with the scale of the proposed houses.

11. The landscaping strategy is integral to the proposals, including: planting within front gardens and the streetscape; generous rear gardens; the retention of existing open space and trees; investment in the informally used open space adjacent Latchmere Close, and the provision of a formal landscaped area to the west of Latchmere House, together with a ha-ha swale feature and lawned area to the west, which will enhance the setting of Latchmere House substantially. Play space is provided as an integral part of the greenspace adjacent to Latchmere Close.
12. The proposals respond positively to the heritage opportunities of the site, vastly improving the setting of Latchmere House. Consideration was given to the retention of two outbuildings associated with Latchmere House; however, due to the poor condition of the buildings and substantial alterations to them, together with the implications of their retention on the overall masterplan layout, it is considered that on balance the scheme as a whole will benefit from the removal of the remaining fabric of these buildings.
13. The density of the proposals will be approximately 30 units per hectare. The form and quantum of development is considered appropriate to the site context, which features predominantly low density housing. The desirability of retaining substantial open space and trees is clearly set out within the Planning Brief and this has a direct impact on achievable densities.
14. The proposals include 34 on site affordable housing units, which comprise 38% of total units. The application is accompanied by a financial viability assessment, which demonstrates that this is the maximum that the scheme can support, taking a view on future market trends. The affordable housing is located in one part of the site to enable effective management by an RSL; nominations rights can be apportioned between the two boroughs. This approach is endorsed by the Planning Brief. The proposed affordable housing mix responds to adopted planning policies in both boroughs.
15. The quality of housing will be very good. All units will meet or exceed adopted minimum internal space standards. All houses will be provided with private rear gardens together with front gardens. Apartments will be provided with private balconies wherever practical; in addition, shared amenity space will be provided.
16. The transport impacts of the proposal will be limited and there will be a net reduction in transport impact compared to the previous remand centre use. The proposed access arrangements are acceptable with regards to relevant highways standards. Two points of vehicular access are proposed, which is considered appropriate to the quantum of development. Pedestrian and cycling permeability is achieved through the site, in accordance with adopted policies and the aspirations of the Planning Brief.
17. Car parking will be provided in general accordance with adopted standards; there will be marginally more car parking spaces proposed on a site-wide basis compared to adopted standards; however, given the site location this is considered acceptable in order to ensure there will be no significant on-street parking impacts. Cycle parking will be provided in accordance with adopted standards.
18. The proposed new-build units will achieve Code for Sustainable Homes level 4 and the conversion of Latchmere House into apartments will achieve BREEAM Domestic

Refurbishment Excellent. The proposals provide a good level of sustainable design and adopt a pragmatic approach to the divergent policies of each borough in this respect.

19. In addition to the above, the site has given due regard to a range of detailed planning considerations, including by targeting Secured by Design standards, providing all units as Lifetime Homes and ensuring that flood risk, archaeology and biodiversity are fully considered.
20. The proposals are a high quality response to the development site and will provide much-needed new homes for the area; as such, the proposals should be granted planning permission.

# 1 Introduction

- 1.1 Turley Associates has been instructed to provide planning consultancy advice in relation to the proposed residential redevelopment of the former HM Remand Centre and resettlement prison that occupied Latchmere House and its grounds.
- 1.2 The site is situated across the boundary of the London Borough of Richmond (LBR) and Royal Borough of Kingston (RBK), to the south of Ham Common.
- 1.3 The proposal is for demolition of existing prison buildings, excluding Latchmere House, which is to be retained and sympathetically extended. A high quality suburban residential environment will be created, with the masterplan focusing upon the setting of Latchmere House and the incorporation of extensive landscaping.
- 1.4 Berkeley Homes (Central London) Ltd (Berkeley) is a leading developer of new homes, with a reputation for creating highly individual, high quality homes in carefully chosen locations. Berkeley has a particular focus on London and the South East and has a track record of high quality delivery. The proposals for the site have been developed by a well-established local architectural practice, Matthew Allchurch Architects (MAA), based in Teddington.
- 1.5 This report provides an overview of the proposals and reviews the key planning policy and wider material considerations relevant to the determination of the planning applications. This report should be read in conjunction with the Design and Access Statement produced by Matthew Allchurch Architects (MAA) and with technical supporting documents.
- 1.6 Providing new good quality housing is a key element of sustainable development, as set out within the NPPF and it is clear that London-wide and borough-level policies aspire to deliver a healthy supply of housing to meet and exceed adopted targets. It is within this context that we have assessed the proposals.
- 1.7 In view of the fact that the site is divided between LBR and RBK the proposals have been submitted as two separate planning applications. This report takes a whole site view of the development but assesses the proposals against relevant policies within both boroughs.
- 1.8 An alternative proposal for the site (Scheme 1) has also been submitted for planning permission, which takes a different approach to the quantum of development and the provision of affordable housing. The alternative proposal is also submitted as two separate planning applications, one in each borough.

## 2 Site and surroundings

- 2.1 Latchmere House and grounds was formerly an HM Remand Centre, most recently used as a resettlement prison. The site was surplus to the requirements of the HM Prison Service and therefore disposed of by the Ministry of Justice.
- 2.2 The site is located to the south of Ham Common and is partly located within both the London Borough of Richmond and the Royal Borough of Kingston. The site area is 3.58ha, of which 2.28 ha is within LBR and 1.3ha is within RBK.
- 2.3 The surrounding area is predominantly occupied by low-medium density suburban housing, served by local shops on Tudor Drive, to the south-west. The nearest central areas are Kingston-upon-Thames, to the south, and Teddington, to the west, across the Thames. To the north and north-east are the open spaces of Ham common and Richmond Park.
- 2.4 The surrounding pattern of development is largely two-storey semi-detached and short terraced properties, with a significant number having been extended to two-and-a-half / three storeys through use of the roof space. Much of the area was developed in the inter-war period although a number of later developments have occurred, such as the properties on Beard Road, Cowper Road, Ham Ridings and Bainbridge Close. There are some three storey properties within the area not least an element of Latchmere House itself and a number of apartment properties, such as those on nearby Beard Road.
- 2.5 The buildings on the site itself are a mixture of utilitarian blocks associated with prison use, of generally one or two storeys. Latchmere House was originally built as a residential property and later extended and altered, such that it has three storey, two storey and single storey elements. The site is substantially covered by hard-standing but retains some green areas including a number of mature trees. The site is bounded by a tall boundary treatment consisting of a wall with fencing above, of approximately 4m in total height.
- 2.6 Existing access to the site is to the north-west, from Church Road, via a road which also provides access to Church Road from Latchmere Close and Bainbridge Close.



### 3 Planning policy context

- 3.1 Planning applications should be determined in accordance with the adopted Development Plan, unless material considerations indicate otherwise.
- 3.2 The Development Plan within the London Borough of Richmond upon Thames consists of the following documents:
- Saved policies of the Unitary Development Plan (2005)
  - Core Strategy (2009)
  - Development Management Plan (2011)
  - Proposals Map (2011)
  - London Plan (2011)
- 3.3 In addition, adopted Supplementary Planning Guidance and Documents will be a material consideration.
- 3.4 The Latchmere House and HM Remand Centre Planning Brief (2013) was produced jointly by LBR and RBK; the Brief is a non-statutory document forming a material consideration for the site.

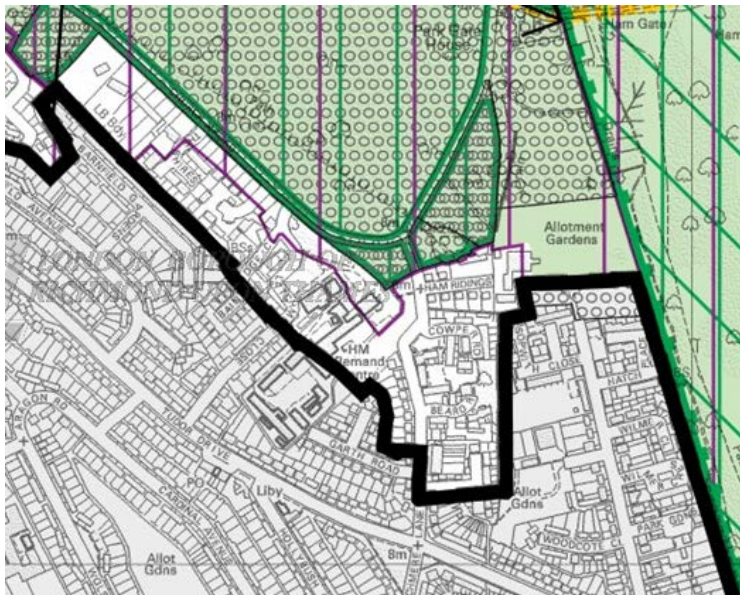


Figure 1: Richmond LDF Proposals Map (2011)

- 3.5 The policy designations within Richmond, according to the adopted Proposals Map (Figure 1), are:
- Partial Conservation Area coverage (Ham Common). Latchmere House is referred to as a Building of Townscape Merit within the conservation area.
  - Preserved Trees
- 3.6 In addition, the following nearby designations may be of relevance:

- Metropolitan Open Land and Public Open Space (Ham Common, leading to Richmond Park), to the north
- Other Site of Nature Importance, to the north
- Archaeological Priority Area (Ham Common)

3.7 The Development Plan within the Royal Borough of Kingston upon Thames consists of the following documents:

- Core Strategy (2012)
- Proposals Map (2012)
- London Plan (2011)

3.8 In addition, adopted Supplementary Planning Guidance and Documents will be a material consideration.

3.9 The Latchmere House and HM Remand Centre Planning Brief (2013) was produced jointly by LBR and RBK; the Brief is a non-statutory document forming a material consideration for the site.

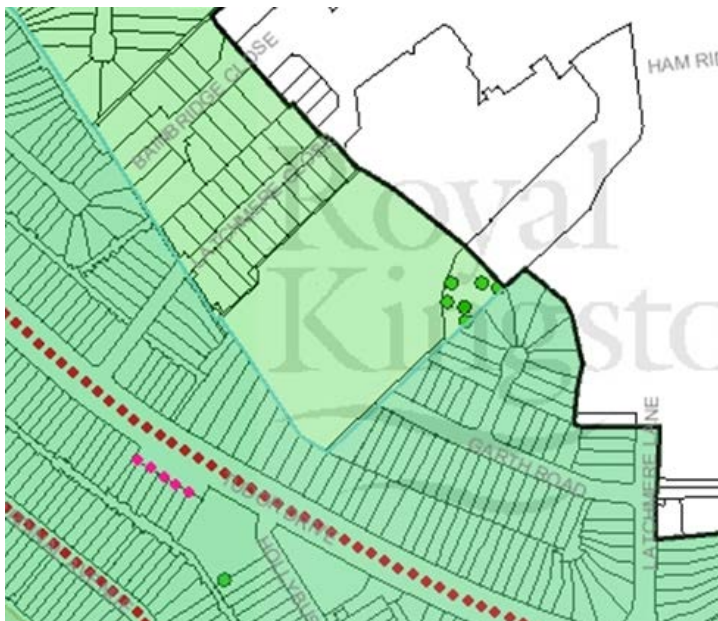


Figure 2: Kingston Core Strategy Proposals Map (2012)

3.10 The policy designations in Kingston, according to the Proposals Map (Figure 2), are as follows:

- Neighbourhood Policy LDF – Kingston Town

3.11 In addition, the following nearby designations may be considered of relevance:

- Local Area of Special Character (Tudor Estate)
- Borough Strategic walking network, on Tudor Drive
- Local Centre LDF, on Tudor Drive

## 4 Proposals

- 4.1 The description of development, for the entire site across both boroughs, is:

*Demolition of existing buildings, excluding Latchmere House. Provision of 89 residential units (Use Class C3) comprising 82 new build units and the conversion and ground floor extension of Latchmere House to provide 7 apartments. Associated highways works, landscaping, tree works and car parking.*

- 4.2 The site will be accessed from Church Road and from a new access via Latchmere Lane. The site will be permeable for pedestrians and cyclists, with access points to Garth Road (south), Latchmere Close (west), Church Road (north) and Latchmere Lane (east). Vehicular access will be restricted by no through roads.
- 4.3 The majority of protected trees and mature trees within the conservation area will be retained. There will be substantial landscaped areas within the site, including open space adjacent Latchmere House and open space providing play space on the green space adjacent to Latchmere Close.
- 4.4 The masterplan is focused upon Latchmere House. The site entrance from Church Road reveals views of the house and formal gardens, framed by 'gatehouses'. The site entrance from Latchere Lane reflects a country estate aesthetic. The site is laid out around a central avenue that runs north-west / south-east, with Latchmere House sited at the north-west end.
- 4.5 Refer to the Design and Access Statement for a detailed explanation of the proposal and to the submitted planning drawings.

## 5 Consultation and pre application advice

- 5.1 There have been a number of pre-application meetings held with both local authorities that have taken place during the design process – key meetings are set out in summary below:
- 19<sup>th</sup> October 2012: Initial pre-application meeting with both councils' planning teams;
  - 25<sup>th</sup> January 2013: Meetings to review draft Planning Brief;
  - 18<sup>th</sup> April 2013: Pre-application meeting (timed to coincide with the public consultation event);
  - 15<sup>th</sup> July 2013: Preliminary Affordable Housing meeting;
  - 29<sup>th</sup> July 2013: Pre-application meeting;
  - 24<sup>th</sup> September 2013: Pre-submission briefing meeting;
  - 18<sup>th</sup> October 2013: Amended scheme briefing - LBR
  - 31<sup>st</sup> October 2013: Amended scheme briefing - RBK
- 5.2 It became clear at the meeting held shortly before the intended submission in September 2013 that the initial proposed scheme of 73 units was not in line with planning officers' aspirations for the site with particular reference to housing density and on site affordable housing provision.
- 5.3 Following the meeting the design team then revisited the scheme to establish the maximum amount of affordable housing the scheme could financially deliver on site, whilst maintaining the overall masterplan concept which preserves open space and enhances the setting of Latchmere House, whilst responding to the surrounding urban grain.
- 5.4 The proposed 89 unit scheme (Scheme 2) accompanies a separate application for a 73 unit scheme (Scheme 1).

## 6 Planning analysis

6.1 Based on a review of the relevant Development Plan documents together with the adopted Planning Brief, the following planning considerations have been identified as being relevant to the determination of the application:

- Principle of use
  - Principle of residential use
  - Loss of previous use
- Urban design and response to local context
  - Site layout and public realm
  - Height, scale and massing
  - Landscaping and biodiversity
  - Conservation area and Building of Townscape Merit
  - Latchmere House outbuildings
  - Density
  - Amenity
- Housing
  - Location of affordable housing
  - Quantum of affordable housing
  - Affordable housing viability
  - Housing typology and mix
  - Mix of affordable housing
  - Mix of market housing
  - Housing quality, including space standards and amenity space
- Public open space
- Play space
- Transport
  - Highways impact
  - Site access
  - Car parking
  - Cycle parking
- Sustainable design
- Trees
- Other planning considerations
  - Designing out crime
  - Accessibility
  - Daylighting
  - Refuse and Recycling
  - Noise
  - Archaeology
  - Flooding and drainage

- Biodiversity
- Land contamination
- Planning obligations

## **Principle of use**

### ***Principle of residential use***

- 6.2 Residential development of the site is acceptable in principle. The planning policies of both councils support the provision of additional housing units, in order to meet market demand and affordable housing need.
- 6.3 LBR has an annual housing target of 270 units per annum to 2017, as set out within the London Plan. Core Strategy policy CP14.A notes that the council will exceed the minimum strategic dwelling requirement, where this can be achieved in accordance with other LDF policies. Similarly, RBK's Core Strategy policy CS10 seeks to meet and exceed the borough's annual housing target of 375 units.
- 6.4 Richmond's Annual Monitoring Report (December 2012) states that the annual net dwelling requirement was not met in 2011-12, with a net gain of 208 units compared to a target of 245, which the council seeks to exceed each year and over the plan period. Kingston's 2012 Annual Monitoring Report reports a housing delivery of 228 units in 2011-12 against a target of 375 units. Over the period 2007/8 – 2010/11 delivery in Kingston fell short of the target by 567 units.
- 6.5 Given the housing need within both boroughs it is clear that a fully residential scheme is justified. London Plan housing targets look set to increase to an annual target of 315 units in Richmond and 643 units in Kingston (2015-2015) under draft further alterations to the London Plan (2014).
- 6.6 The Planning Brief establishes an aspiration for residential use of the site, with a preference for family housing.

### ***Loss of previous use***

- 6.7 The site was last used as a remand centre, which falls within the C2A Use Class (secure residential institutions). There is no specific protection of C2A uses within either borough's planning policies and the site was surplus to requirements by HM Prison Service.
- 6.8 A C2A Use Class is not a 'community' use in the normal understanding of the word, nor based on the definitions given within adopted local policy documents. Such uses do not generally provide locally-accessible services or infrastructure, which is a feature of those uses identified as community uses by paragraph 8.3.4.6 of Richmond's Core Strategy and paragraph 6.167 of Kingston's Core Strategy.
- 6.9 The Planning Brief (paragraph 5.11) states that consideration should be given to the provision of community uses on the site; however, alternative arrangements have been

made in this respect by a proposed financial contribution, to be secured through planning obligations, to improve the Tudor Drive Library.

- 6.10 Adopted planning policies direct new community facilities to accessible locations (Richmond policy DM SI 1 and Kingston policy CS 16) and given the low PTAL of the site it is not considered that the site would be appropriate or viable for a community facility. This point was raised during Berkeley's engagement with the councils' Working Group involved in the preparation of the Planning Brief. Community facilities in viable locations should be supported; on this basis it is proposed to contribute financially to the existing library on Tudor Drive.

### **Urban design and response to local context**

- 6.11 The proposals have been developed based on a detailed analysis of and response to the surrounding area at the beginning of the design process. This is in accordance with general planning principles and also responds to the Vision set out within the Planning Brief. Compatibility with local character is sought by LBR policy DM DC 1 and RBK policy DM10. The following features are considered to contribute to the character of the surrounding area:

- Post-war suburban housing to the east, south and west, of varying ages and architectural styles
- Generally semi-detached properties, short terraces and detached houses but with some apartments within the vicinity
- Most properties are set within varying amounts of private gardens, or communal space in the case of apartments
- A mix of off-street parking and on-street parking
- The highways network includes local through roads and several examples of culs-de-sac, some of which are private roads. Many are typically suburban in character, lined on both sides with housing development of modest density. The northern side of Church Road borders Ham Common with few structures present, while the southern side largely comprises very low density detached houses set well back from the road.
- Predominant building height is two original storeys but with many substantial roof extensions (effectively two-and-a-half / three storey). There are also taller buildings including Latchmere House and a number of apartment blocks in the area.
- Extensive swathes of Metropolitan Open Land to the north, with well-established mature natural landscaping, all of which enjoys the benefit of conservation area designation

- 6.12 In addition to the character of the surrounding area, a clear material consideration is the character of the site itself, which can be summarised as follows:

- Substantial boundary treatments
- Disparate collection of buildings including a number of large blocks with a variety of roof types but a number of flat roofs
- Buildings situated up to the site boundary in many locations
- Substantial areas of hard standing
- Mature trees and open spaces within the site and surroundings



- Latchmere House is a key feature of the site; the house sits within a compromised setting and is in need of restoration
- 6.13 The character of the site and surrounding area suggests that an appropriate form of development could comprise:
- Proportionate response to heritage considerations, namely: the unlisted Building of Townscape Merit and the conservation area designation
  - Predominantly two-three storey residential units, with potential for taller buildings and roof accommodation
  - A housing-led scheme with the potential for a proportion of units to be provided as apartments
  - Terraced, semi-detached, detached units and apartment blocks
  - Architectural approach which responds to one of the local styles in evidence or, given the size of the site, is capable of providing its own more independent design ethic
  - Private gardens for proposed houses
  - Parking provision to meet a reasonable level of off-street capacity
  - Through-routes or culs-de-sac could be considered; however, the preference in the Planning Brief is for no vehicular through-routes
  - Incorporation of existing open space and mature trees into the site masterplan
  - Opportunity to improve relationship of boundary to neighbours, in terms of the boundary treatment and the proximity of buildings
  - Reduction in hardstanding and increase in permeable surfaces and soft landscaping
- 6.14 The policies of both councils refer to prevailing or coherent patterns of development within the site context, and Richmond's policy DM DC 1 specifically notes (in the supporting text) that schemes should not depart from a coherent and predominant character, where this is of merit.
- 6.15 In this instance there are clear commonalities in terms of the broad character and density of surrounding developments; albeit with some notable variations; however, there are also substantial variations in terms of architectural style, street typology, house type and so forth. On the basis of this variation and given the size of the site, there is a clear opportunity for the site to establish its own character, whilst being broadly responsive to local context.
- 6.16 The following topic areas are considered to provide an understanding of how the proposals respond to the site context in terms of urban design:
- Site layout and public realm
  - Height, scale and massing
  - Landscaping and biodiversity
  - Conservation area and Building of Townscape Merit
  - Latchmere House outbuildings
  - Density
  - Amenity
- 6.17 Whilst care has been taken to respond closely to the site context, it should be noted that compatibility with local character does not necessarily require an exact replication of the



site surroundings. Kingston's policy DM10 notes that new developments should respect essential elements of local character, rather than replicate existing forms of development.

### ***Site layout and public realm***

- 6.18 The masterplan has been laid out in order to allow Latchmere House to act as a focal point and respond to surrounding patterns of development. As such, the proposals will implement the Vision set out within the Planning Brief, which envisages a development responsive to the character of surrounding areas and compatible with the local landscape.
- 6.19 The site is arranged around a central avenue leading up to Latchmere House and the majority of houses are sited to the rear of existing properties, with suitable garden lengths. This back-to-back relationship to the existing and proposed rear gardens reflects the general pattern of surrounding inter-war properties.
- 6.20 The site layout is also a response to site constraints, which include protected and other mature trees and what may be termed 'structural landscaping' in the sense that its development would not commonly be regarded as representing the optimum proposal in terms of retaining local character and openness. Refer to the constraints and opportunities drawing, within the Design and Access Statement.
- 6.21 The Planning Brief, and adopted policies, note the importance to urban design of space between buildings. Within the site there are varying degrees of space between the buildings. In general the site is typical of surrounding housing layouts, with good sized front and rear gardens, and limited gaps to the side of properties in order to allow a reasonable quantum of development to come forward.
- 6.22 The layout of the apartment units responds to this prevalent typology through the provision of rear amenity space where possible, an element of landscaped defensive space to the front and a perimeter block approach whereby active street frontages are maximised as far as possible. Every feasible opportunity has been taken to provide private and/or communal landscaped space.

### ***Height, scale and massing***

- 6.23 The Planning Brief and development plan policies seek that height, scale and massing should be appropriate to the site context. The proposed development achieves this. As noted above, the predominant surrounding building height is two original storeys but with many substantial roof extensions (effectively two-and-a-half / three storey). There are also taller buildings, including Latchmere House and a number of apartment blocks in the area, such as the three storey blocks on nearby Beard Road.
- 6.24 The proposed houses are generally two full storeys plus sensible and stylistic use of the roof space to provide a third level of accommodation. In effect, much of the development potential that would typically be taken up through householder Permitted Development rights has been utilised, whilst allowing control over design quality and consistency. In addition, there are some three storey housing units proposed; these are located within the core part of the site and are considered to give a positive variation to the streetscene.

The proposed houses are appropriate to the site context, achieving good-sized and well-proportioned family units.

- 6.25 The proposed apartments would be provided within both two storey and three storey buildings. Block B is the only three storey block and is sited well within the site confines. Block B has been sited within the vicinity of Latchmere House because this building includes a three storey element and is a substantial building. It is considered that this context is appropriate to a three storey building.
- 6.26 The apartment units and affordable housing units are appropriate in terms of massing/bulk, given that they comprise a combination of semi-detached and terraced properties together with apartment blocks that are of a similar footprint to terraces within the surrounding area. Block B is of a slightly large scale but is located internally within the site and is designed to integrate with the overall development.

### ***Landscaping and biodiversity***

- 6.27 The Planning Brief Vision seeks a development that enhances the existing green space network and delivers strong green links to surrounding areas. As a result of the change from a secure residential institution to a residential development the site will provide a significant amount of substantially upgraded open space pursuant to policies CS3 and DM 5 of Kingston's Core Strategy and Richmond's policy DM OS 6.
- 6.28 The surrounding areas to the north feature substantial areas of green space, including Ham Common. The site will link to these areas through the retention of existing areas of open space and proposed pedestrian links through the site.
- 6.29 Kingston's Residential Design SPD recommends that 'landscape design should begin with sound analysis of the intrinsic landscape characteristics and aim to incorporate those landscape elements of value; and create a structured landscape setting that includes provision of open space appropriate to the location and scale of a development'. The masterplan approach retains key existing elements of open space, which will provide well-managed substantial open space and richer landscaping for the long term benefit of both existing and future residents of the area.
- 6.30 In addition to the retention of existing open space, the landscape strategy for the site incorporates a formal garden to the north-west of Latchmere House and formalises and improves the open space adjacent to Latchmere Close, which is within the site boundary but, due to historic Prison Service inter-connections with the formerly 'tied' adjacent housing, has been used informally by existing residents in the area.
- 6.31 The streetscene will be 'greened' through tree and shrub planting within front gardens, such that driveways and refuse storage facilities (necessary to the front of inner-terraced properties) will be integrated within the landscape scheme. As such, views along the estate roads will feature soft rather than hard landscaping as the dominant visual experience. This element of the landscaping will be appropriate to the suburban nature of the site.

6.32 The parking areas on the green space opposite Latchmere Close have been subject to a carefully designed landscaping strategy in order to integrate the spaces within the public realm. Whilst accommodating some necessary parking provision along the edge of the green, the majority of green space is retained and its on-going maintenance will be provided for together with the installation of integrated play space. The utility of this space will therefore be increased.

### ***Conservation area and Building of Townscape Merit***

6.33 The setting of Latchmere House and the character of the conservation area will be substantially improved by the proposals, in accordance with policy HD 1 of Richmond's Development Management DPD and policy DM12 of Kingston's Core Strategy. A key part of the Planning Brief Vision is to provide a viable use for the retained Latchmere House, and this will be achieved by the proposals.

6.34 The Ham Common Conservation area was established in 1969 and in 2004 was extended to incorporate Latchmere House and the very northern part of the site.

6.35 The conservation area is centred on Ham Common. The significance of the conservation area is derived from its history as a formerly rural settlement that developed around Ham Common and with later mansions built in the 18<sup>th</sup> century. Latchmere House is within the Church Road sub-area and is identified as a local landmark within views of Church Road and a gateway feature to Ham Common. The mature trees and landscaping in the area contribute to the more natural/less developed character of this part of the conservation area.

6.36 A request for statutory listing was rejected on the advice of English Heritage in 2008. Nevertheless Latchmere House is now recorded by LBR on its own local non-statutory list of Buildings of Townscape Merit (BTM).

6.37 The proposal responds to the conservation area designation across the north of the site by retaining and substantially improving the existing landscaping within the vicinity of the house, thus enhancing the setting of the BTM. The removal of extensive areas of hardstanding and numerous prison buildings of no architectural merit, which are sited unsympathetically in relation to the house, will also enhance the setting of the BTM. The introduction of a 'knot garden' to the west of the house is a noteworthy addition to the setting of the house and reflects its origins as a country residence. The knot garden also provides a means to successfully integrate the required level of parking within the setting of the house.

6.38 The proposed houses and apartments along the main avenue and at the Church Road site entrance frame the principle views of Latchmere House within the site, and further promote its primacy within the masterplan.

6.39 The Latchmere Lane site access is designed by reference to a 'country estate' road aesthetic, in terms of its sinuous route and use of materials. This route provides a good entrance approach to the house.

- 6.40 Paragraph 137 of the NPPF supports development within conservation areas and within the setting of heritage assets that enhances or better reveals the significance of the heritage asset. The NPPF notes that 'proposals that...better reveal the significance of the asset should be treated favourably'.

#### **Latchmere House outbuildings**

- 6.41 Outbuildings contemporary with Latchmere House are referred to within the Planning Brief; two have been identified but have been subject to substantial alteration and extension. Both lie outside the conservation area and are sited in isolated and fragmentary locations. The outbuildings make a very limited contribution to the setting of Latchmere House.
- 6.42 An investigation was carried out to determine the potential for re-use of these two outbuildings. The study concluded that the alterations to these buildings were such that little remained intact of the original fabric, and the historical significance of the buildings was low. The potential to practically convert the buildings into acceptable residential units is poor. Furthermore, the implications on the overall masterplan of retaining the outbuildings out-weigh any benefit of their retention. The submitted masterplan provides a better setting for Latchmere House than could be achieved with retained outbuildings and also enables a greater number of new homes to be provided, which is a clear aspiration of local, London-wide and national planning policy. On balance the removal of the outbuildings allows a range of broader planning objectives to be met, to the overall benefit of the scheme.

#### ***Density***

- 6.43 The proposals are for a housing density of approximately 30 units per hectare, accounting for areas which are not considered appropriate for development. The form of development proposed is appropriate to the local context, whilst also providing a reasonable quantum of development.
- 6.44 Local policies reflect the London Plan density matrix and this is referenced within the Planning Brief, which seeks a density towards the lower end of the relevant 35-75 units per hectare recommended range. The Planning Brief did not include a detailed assessment of achievable densities in relation to site constraints.
- 6.45 Local policies CP14 and DM10 encourage optimisation of development, balanced against consideration of compatibility with local character. The development should therefore be compatible with prevailing typologies, together with the conservation area and Building of Townscape Merit. The public transport accessibility of the development also has a bearing on appropriate densities, with less accessible areas being more appropriate for lower density development.
- 6.46 The Planning Brief contains an analysis of local residential densities. The density range is between 9.7 dwellings per hectare and 83 dwellings per hectare, with 21-29 dwellings per hectare being the most typical within the immediate context. On this basis, the proposed density is considered appropriate to the local context.

- 6.47 Measuring the site density requires a degree of judgement given the development constraints within the site, in particular protected trees and existing areas of open space. Previous guidance on density measurements was contained within Circular 01/02, which stated that open spaces serving a wider area and significant landscape buffer strips should be excluded from the site area for density calculations.
- 6.48 It is reasonable to conclude that the majority of the open space and trees to the east of Latchmere House can be considered to be an integral part of the development, providing open space for residents. The area beyond the proposed pedestrian path parallel to Latchmere Lane can be considered incidental or structural and can thus be excluded from the density calculations. The open space adjacent Latchmere Close is beyond the main area of the site and the extended site access road to Bainbridge Close, together with the dense brace of trees to the south of Church Road are not areas that the council would wish to see developed; on this basis the density calculation may also reasonably exclude these areas.

### ***Amenity***

- 6.49 The siting of the proposed houses and apartments has taken account of the amenity of neighbouring properties. As such, there are sufficient separation distances in accordance with local policy guidance.
- 6.50 The chosen layout is an obvious and natural reflection of the surrounding established pattern of residential development. Arrangements of existing and proposed dwellings mirror each other together with their appropriately sized back-to-back gardens.
- 6.51 Kingston's Residential Design SPD (2013) recommends a minimum separation distance of 21m between habitable room windows and 15m between rear elevations and flank walls. Richmond's Small and Medium Housing Site SPD (2006) notes that a distance of 20 metres should be maintained between habitable room windows.
- 6.52 All of the buildings will comply with this in terms of the relationship to existing neighbouring dwellings.
- 6.53 There are a number of detailed relationships within the site that have been reviewed in order to avoid privacy impacts between the occupants of the proposed units:
- The relationship between Block A and Block C is acceptable. Whilst the buildings are relatively close there will be no habitable room windows facing within a 45 degree arc from either facing elevation.
  - The balconies to the rear of Block B are screened to the side, which will prevent overlooking of the rear elevations of the affordable housing fronting Latchmere Close and the terrace of private housing to the south, in accordance with LBR policy DC 6. Balconies are not provided at 2<sup>nd</sup> floor level and the accommodation and massing is restricted to the inner part of the building at 2<sup>nd</sup> floor level.
  - Whilst there are habitable rooms in the rear elevation at first floor of Block B, there are no habitable rooms within the first floor elevations of the affordable housing. Block B is also at an acute angle to the housing, which reduces any sense of overlooking

substantially. Block A does not include habitable rooms to the rear at first floor level, so there will be no overlooking between Blocks A and B.

- The main rear elevation of the proposed detached house H.044 is beyond 21m from the main rear elevation of the closest existing house. There are no habitable rooms above ground floor level. This unit has been moved further from the site boundary during revisions to the scheme and in consultation with neighbours.
- The distance between house types H.046 and H.048 is just under 20m. This is considered acceptable on balance, particularly in relation to new units not impacting on existing residents.
- The detached double garage to the rear of houses on Latchmere Close is only 2.5m in height to the roofline and the pitched roof slopes away from the boundary. No material impact on amenity is envisaged therefore.

## Housing

### ***Location of affordable housing***

6.54 The affordable housing is located within one part of the site, which sits within Richmond, for a number of reasons:

- This by far the most practical approach and will enable the greatest quantum of affordable housing to be delivered. The layout is efficient in terms of the amount of space necessary for access, parking, amenity space and space to accommodate the footprints of the buildings themselves.
- The northern part of the site, in proximity to Latchmere House, is most suited to slightly taller buildings with a moderately greater density, given that Latchmere House is already a taller element within the area and has a more substantial massing than immediately surrounding residential properties.
- Enabling a reasonable proportion of the site to be given over to market housing provides sufficient subsidy for the proposed level of affordable housing.
- Placing the affordable housing within one part of the site meets the management requirements of Registered Providers.
- The location of the affordable housing in one part of the site facilitates the provision of a CHP plant, which will provide substantial carbon dioxide savings and relies upon a higher density of development to allow for efficient operation. The CHP will provide heating and hot water specifically to the affordable units, and is only possible with the affordable units within one part of the site. The CHP contributes significantly to achieving high standards of sustainable design. Refer to the Sustainability and Energy Assessment for further details.

6.55 The Planning Brief notes that:

*'The site should be viewed as a whole to make the best use of land. It is recognised that a comprehensive development approach may not allow provision within each borough of affordable housing, and other requirements which will benefit the scheme as a whole, such as provision of amenity and play space. The development scheme will therefore be required to seek to ensure that each borough is not disadvantaged in provision of these planning obligations.'*

- 6.56 The split of nominations rights between the two councils can be agreed so that the proposed units can be allocated to best meet local needs.
- 6.57 It should be noted that, irrespective of borough boundaries, the provision of both market and affordable housing will meet local demand and need. The constraints of the site are such that the affordable housing and the amenity spaces are located within Richmond and the Kingston part of the site contains only the market housing. This is the most effective means to arrange the masterplan layout and should be supported in the interests of good planning.

### ***Quantum of affordable housing***

- 6.58 The proposals comply with adopted policies regarding affordable housing. The maximum reasonable amount of affordable housing is proposed, taking into account financial viability and other planning policy requirements and material considerations.
- 6.59 RBK policy DM 15 states that the council will 'explore all opportunities to deliver new affordable units as part of new residential developments'. The council seek the 'maximum reasonable amount of affordable housing, subject to viability considerations' within the context of a 50% site specific target.
- 6.60 LBR policy CP15 sets a 50% strategic target and notes that 'some form of contribution towards affordable housing will be expected on all new housing sites' and 'at least 50% on-site provision' for major schemes, although subject to the proviso that in the case of viability issues developers can submit a viability assessment 'showing the maximum amount that could be achieved on the site'. Policy DM HO 6 contains similar provisions, seeking the 'maximum reasonable amount of affordable housing having regard to the strategic borough-wide target and the individual circumstances of the site'. It is noted that the council will have regard to economic viability together with other planning benefits.
- 6.61 The scheme will provide 34 affordable properties, which is 38% of total units. The affordable properties will predominantly be provided as flats; however, there will also be seven houses, which take up a substantial part of the site area and help to integrate the apartment blocks within the overall masterplan.
- 6.62 The project team have held a number of meetings with officers from both LBR and RBK to discuss the site since October 2012. The initial affordable housing proposal was set out formally in a letter dated 15 August 2013.
- 6.63 The proposal put forward in August was for circa 12 affordable houses on site plus a commuted sum; this is reflected in the proposed 13 affordable houses that would form part of Scheme 1. That proposal was not favoured by officers and consequently an alternative scheme was produced with a higher level of affordable housing on site. This was tabled with both councils in October 2013 and has been developed in further detail to produce Scheme 2, the subject of this application.
- 6.64 Scheme 2 is a response to feedback from officers at both LBR and RBK, from whom there was a request for a greater quantum of on-site affordable housing, which has resulted in a scheme of increased density.



6.65 Of the 34 units, 28 will be Affordable Rent (82%) and the remainder intermediate (shared ownership). This tenure split reflects the priority accorded within both boroughs to the provision of social housing. Richmond's Core Strategy seeks an 80:20 ratio and Kingston's Core Strategy seeks a 70:30 ratio. The provision is in-line with the former and broadly in-line with the latter. If necessary, nominations arrangements between the two councils can reflect the differing ratios sought.

### ***Affordable Housing – Viability Appraisal***

6.66 The application is accompanied by a Viability Appraisal. The proposed affordable housing offer is the maximum Berkeley can currently commit to on the basis of assuming significant market growth.

6.67 The analysis in the report demonstrates that the affordable offer of 34 properties is dependent upon Berkeley taking a significant risk on market growth to deliver an acceptable margin and this is therefore the maximum reasonable level of affordable housing that can be provided. Please refer to the Viability Appraisal for the assumptions and discussion regarding this.

### ***Housing typology and mix***

6.68 The site reflects the character of the surrounding area with regards to the proportion of the site area given over to houses and to apartments respectively.

6.69 The Planning Brief seeks development to be generally in the form of houses rather than flats. There are 55 houses and 34 flats within the development, including the conversion of Latchmere House to provide eight flats. The number of houses exceeds the number of flats and the area given over to housing is greater; the overall character of the development is as a housing development with an element of apartments. There are only three apartment buildings on the site. This reflects the surrounding area, which features a predominance of houses, but also a number of apartment blocks. The affordable housing provision includes both houses and flats. The quantum of affordable housing is increased by the provision of apartments, whilst there is also a substantial area given over to affordable houses.

6.70 The proposed 34 affordable units comprise 7 houses and 27 affordable flats of which 6 will be 3 bed family units. The site's location presents an excellent opportunity to deliver high quality family dwellings, which benefit from the surrounding open space and amenities, together with private gardens.



Unit size		Market (including LH)	Affordable Rent	Intermediate
1 bed	14		8	6
2 bed	12	5 (5)	7	
3 bed	22	12 (2)	10	
4 bed	17	14	3	
5 bed	24	24		
	<b>89</b>	<b>55</b>	<b>28</b>	<b>6</b>

Table 1, Housing mix

***Mix of affordable housing***

6.71 The affordable housing is provided as a broad mix of unit types, as set out in the following tables.

			Preferred policy mix	
Unit size	Number of units	Percentage of units	Kingston SPD mix (%)	Richmond (Investment Framework)
1	8	28.6	29	5
2	7	25	38	40
3	10	35.7	26	50
4	3	10.7	2	5
	<b>28</b>			

Table 2, Affordable Rented housing mix (above)

Unit size	Number of units	Percentage of units	Kingston SPD mix	Richmond (Investment Framework)
1	6	100%	75%	70%
2	-	-	18%	30%
3	-	-	7%	-

Table 3, Intermediate housing mix

- 6.72 The Affordable Rent mix meets Kingston’s requirements with regards to one-bed units, but exceeds the recommendations for Richmond within the Investment Framework. It is considered the nominations split between the boroughs can resolve this. A reasonable number of two-bed units are provided; whilst this is below policy recommendations outlined above, the mix focuses on the provision of family housing, which is considered appropriate for the site.
- 6.73 The Intermediate accommodation is provided as one-bed units, which is the overwhelming priority within both boroughs for this tenure of accommodation.
- 6.74 There is an unmet need for affordable housing units of all sizes in both the Affordable Rent and Intermediate tenures. As such, all of the units proposed will fulfil a clear need.

***Mix of market housing***

- 6.75 The market housing will be family units, in accordance with adopted policies and as appropriate to the site location and surrounding pattern of development. As an exception, it is proposed to convert Latchmere House into five two-bedroom flats and two three-bedroom flats. This will add to the mix of housing proposed and is the most sensitive means to convert the existing building into residential units.
- 6.76 Richmond’s Core Strategy policy CP14 seeks a minimum of 25% 1-bed units, depending on location, whereas Development Management policy DM HO 4 states that developments should generally provide family-sized accommodation. It is considered that the provision of 1-bed market units would be less appropriate on this site, given the general pattern of surrounding development and the likely market demand in the area. Larger units will fulfil market demand and generate better returns to subsidise the affordable housing units. The Development Management policies document is more recent than the Core Strategy and is likely to better reflect current priorities.

- 6.77 Kingston's Core Strategy policy DM12 seeks a mix of unit sizes, including a minimum of 30% 3-bed, but notes that the latter proportion can be exceeded on sites suited to large family housing. In our view the site is best-suited to market family-sized market units.

## **Housing quality**

### ***Space standards***

- 6.78 All of the proposed affordable and market units will meet or exceed the minimum space standards established by the London Plan. Refer to the submitted accommodation schedule.

### ***Amenity space***

#### **Apartments**

- 6.79 The apartments are provided with private amenity space where possible and in addition an element of communal space is provided. Units without private balconies have been allocated additional internal space above London Plan standards, together with Juliette balconies, in order to provide additional living space and an exterior connection.
- 6.80 The Mayor's Housing SPG recommends a minimum 5m<sup>2</sup> private amenity space per 1-2 person dwellings and an extra 1m<sup>2</sup> per additional occupant. Richmond's Residential Development Standards SPD (2010) refers to the London Plan standards. Kingston's Residential Design SPD seeks 10m<sup>2</sup> per flat plus 1m<sup>2</sup> per additional occupants in larger units.
- 6.81 The majority of apartments are provided with private amenity space as follows:
- Block A has six flats and all of these are provided with either a ground floor terrace or a first floor balcony. The balconies provided comply with the London Plan recommended space standards.
  - Block B has 15 units. Four balconies and three private terraces are provided for the rear-facing units. The size of these spaces complies with the recommendations. The remaining seven units are provided with increased internal living space together with Juliet balconies to the living areas.
  - All flats in Block C have private amenity space in accordance with adopted standards
- 6.82 Communal amenity space is also provided for the apartment units. There is amenity space to the rear and side of Block B and to the rear of Block C as follows:
- Block B 148m<sup>2</sup>
  - Block C 125m<sup>2</sup>
- 6.83 Kingston's Residential Design SPD seeks 50m<sup>2</sup> of communal space within developments, plus any shortfall in the provision of private amenity space. Richmond's approach to communal amenity spaces is unclear.

## **Houses**

- 6.84 The proposed houses will all have private rear gardens and front gardens, and the majority of front gardens will incorporate off-street parking integrated with the soft landscaping.
- 6.85 Kingston seeks 50m<sup>2</sup> private amenity space per family house, plus 5m<sup>2</sup> for fourth and fifth bedrooms. Richmond does not have separate standards for housing private amenity space.
- 6.86 The majority of the houses meet and exceed the above standards in both the Kingston and Richmond parts of the site. The A-type houses will have garden space in the range of 45-48m<sup>2</sup>, which will provide a reasonable level of private amenity space.
- 6.87 All of the proposed gardens will provide an adequate level of private amenity space for future occupants.

## **Public open space**

- 6.88 The site includes substantial areas of open space in accordance with LBR policy DM OS 6 and RBK policy CS3, which seek on-site provision for larger schemes. Given its location the site is not within an area of open space deficiency. No specific area standards are adopted by local policies; however, the provision on site will cater generously for the needs of the development.

## **Play space**

- 6.89 Sufficient play space will be provided within the site to more than meet the needs of the development. As such, the proposals are considered to be compliant with Richmond policy DM OS 7 and Kingston policy DM 13.
- 6.90 The Mayor's SPG Providing for Children and Young People's Play and Informal Recreation (2008) seeks 10m<sup>2</sup> of play space per child. Richmond Development Management document refers to the same standards. Kingston's standards are unclear given that the Core Strategy refers to the Residential Design SPD and the latter does not provide specific requirements. On this basis London Plan standards are considered an appropriate.
- 6.91 The child yield for the site is estimated at circa 120 children, using the methodologies within Richmond's Planning Obligations Strategy (2005) and Kingston's Planning Obligations SPD (2010). 1,294m<sup>2</sup> of space will be provided on the 'village green', which will include a mixture of formal and informal play provision integrated within the open space. This will exceed the play requirement for the scheme. In addition, the other areas of open space within the site will provide for informal play opportunities, including play opportunities for older children in particular.
- 6.92 It is anticipated that there will be a mix of child ages within the development, but a predominance of primary school aged children. Consequently the play provision within

the green space is likely to focus upon provision for primary school aged children and also nursery school aged children in order to provide an appropriate facility nearby.

6.93 In addition to catering for the needs of the development, the provision of play space within the open space adjacent to Latchmere Close will be a benefit to the local area given that the nearest existing equipped play provision is at the Latchmere Recreation Ground.

## Transport

6.94 The impact of the proposed development has been assessed in accordance with LBR policy DM TP2. The development will have no material impact on the operation of the surrounding highways network.

### *Highways impact*

6.95 The Transport Assessment predicts that peak and daily vehicle movements will be significantly lower than those associated with the previous prison use. As can be seen from Table 4, the a.m. peak is expected to have 32 less arrivals and 17 more departures, resulting in a net reduction of 15, which is a 22% reduction from the overall 69 a.m. trips modelled for the prison. In the p.m. peak there will be 53 less departures and 19 more arrivals, resulting in a net reduction of 34, which is a 43% reduction from the 79 p.m. trips modelled for the prison. The overall trip numbers would be reduced by 97, from a total of 634, which is a 15% reduction.

Use	a.m. peak		p.m. peak		daily	
	Arr	Dep	Arr	Dep	Arr	Dep
Prison	51	18	12	67	318	316
89 unit scheme	18	35	30	13	264	274
Net impact	-32	17	19	-53	-55	-42

Table 4, Proposed net transport impact

6.96 The likely traffic distribution has also been modelled and this is discussed within the Transport Assessment. The results show that 58% of vehicles movements to/from the site are predicted to travel to/from the south, down Latchmere Lane, 28% north towards Petersham Road and 14% north through Ham Gate Avenue.

6.97 The Transport Assessment models surrounding road junctions and concludes that there is significant reserve capacity on the surrounding highway network. On this basis the impact of the proposed residential development on the operation of the local highway network will be insignificant.

6.98 The application is accompanied by a Framework Travel Plan, which sets out anticipated modal splits and measures to target a reduced use of private motorcars.

### **Site access**

6.99 The proposal utilises the existing access onto Church Road and proposes an additional access onto Latchmere Lane.

6.100 The Planning Brief indicates potential access points to the site in three locations:

- Church Road
- Garth Road
- Latchmere Lane

6.101 It is considered that site access via Church Road and Latchmere Lane would be most appropriate for this scheme. The proposed accesses are suitable with regards to relevant highways standards. There will be no significant impacts on the safe and efficient operation of the highway network.

6.102 It is not considered that the additional entrance on Latchmere Lane will have any material impact on the volume or direction of traffic entering and leaving the site. Residents' travel patterns will be based upon their intended destination, rather than the location or number of site access points.

6.103 The proposals will prevent through traffic whilst creating a publically accessible neighbourhood. Pedestrian and cycle permeability through the site is achieved through access points from Church Road, Latchmere Lane, Garth Road and Latchmere Close. In this respect the proposals comply with Richmond Development Management policy TP3 and Kingston Core Strategy policies DM8 and DM10.

### **Car parking**

6.104 The proposals will provide an appropriate level of off-street parking to ensure that the site will not require on-street parking nor impact materially on local traffic conditions.

6.105 Parking policies for the site recommend provision as follows:

<b>Unit size</b>	<b>Number</b>	<b>Parking recommendation</b>	<b>Cumulative</b>
2 bed	26	1	26

3 bed	22	1.5	33
4 bed	16	2	32
5 bed	25	2	50
<b>Total</b>	89		141

Table 5, Parking policy standards

6.106 It is proposed to provide 146 parking spaces, which are comprised of:

- 32 garage spaces - Private
- 56 on plot parking spaces - Private
- 8 off plot parking spaces – Private
- 10 off plot parking spaces – Latchmere House (Private)
- 36 on plot parking spaces – Affordable
- 4 off plot parking spaces - Affordable

6.107 The proposed parking provision is marginally above recommended standards; however, this is considered appropriate to the site context.

6.108 The Mayor’s Housing SPG contains further guidance with regards to the operation of the London Plan parking standards. The two matrices within the appendix demonstrate how the level of parking provision should be responsive to PTAL, location and density, with higher provision in low PTAL, low density, suburban locations, albeit within the maximum standards of two per unit. This approach is also reflected in the minor revised early alterations to the London Plan (2013).

### ***Cycle parking***

6.109 Cycle parking will be provided in accordance with adopted standards, which are set out within Richmond’s Development Management policies document and Kingston’s Sustainable Transport SPD (2013). The following table sets out the proposed parking spaces and adopted standards in each borough:

6.110 160 cycle parking standards will be provided, which exceeds the minimum recommendations. 36 cycle spaces will be provided for the 34 apartments, which marginally exceeds the requirement under Richmond policy for 1 space per flat. 2 spaces will be provided for all houses, which meets the requirement for 4 bed houses and exceeds that for 3 bed houses in Richmond, whilst meeting Kingston’s requirements in both cases.

6.111 For the houses, cycle parking will be provided either within garages or within secure parking in back gardens. For the apartments, cycle parking will be provided in secure and covered shelters.

## Sustainable design

- 6.112 The scheme will achieve a 40% Carbon Dioxide reduction site-wide, compared to the combined baseline. This is based upon an overall 36-37% reduction in emissions for all new build units (compared to a 2010 Building Regulations baseline) and a 40-50% reduction in the efficiency of Latchmere House (compared to estimated pre-refurbishment emissions). The application is accompanied by a Sustainability and Energy Assessment and a completed Sustainable Construction Checklist.
- 6.113 The proposals have had regard to the relatively disparate new-build policy requirements of each borough. The new units will achieve Code for Sustainable Homes level 4 and as a minimum a 25% reduction in Carbon Dioxide emissions (compared to 2010 Building Regulations) but an average of 36%, of which 20-21% is accounted for by renewable energy. The proposals are considered to provide a good level of sustainability, having regard to the scale of development and the viability of the development.
- 6.114 Proposals for new major residential development in LBR are expected to be built to the standards set out within Code for Sustainable Homes Level 3, as per policy DM SD 1 of the Core Strategy; however, the policy also seeks a 40% reduction in Carbon Dioxide emissions compared with Building Regulations 2010, in-line with the London Plan and exceeding the requirements of CSH Level 3. Richmond also stipulates, in policy CP2, that 20% of the Carbon Dioxide reduction should be achieved through renewable energy technology.
- 6.115 RBK local policy seeks Code Level 5 standards for energy/Carbon Dioxide, which requires a 55% reduction in Carbon Dioxide emissions compared with Building Regulations 2010. Developments are encouraged to meet the other Code categories as well as the Carbon Dioxide standard.
- 6.116 The standard of sustainable design achieved and the carbon reductions compared to Building Regulations have been balanced against the design implications of achieving a higher Code level and also the financial implications and resultant impact on achievable levels of on-site affordable housing and planning obligations contributions. Therefore a site wide target of Code Level 4 has been deemed appropriate for the new housing.
- 6.117 The refurbishment of Latchmere House will achieve a substantial improvement on the estimated performance of the existing building. According to Richmond policy DM SD 3 proposals to refurbish existing buildings are encouraged to achieve high standards of energy and water efficiency where possible and to comply with the Sustainable Construction Checklist SPD as far as possible.
- 6.118 The conversion will target BREEAM Domestic Refurbishment Excellent. There is no specific target for BREEAM Domestic Refurbishment set out within Richmond's planning policies; however, Richmond has a target for 'Excellent' under the defunct Ecohomes scheme and on this basis excellent BREEAM DR will be targeted by Berkeley. The pre-assessment anticipates that 'Excellent' should be achievable.
- 6.119 The proposals will also implement key measures set out with the various sustainable design policies of both councils. Sustainable features incorporated into the design of the new dwellings include:



- Passive design and energy efficiency through high-performance façades
- Mechanical Ventilation with Heat Recovery
- Natural ventilation for cooling
- Balanced provision of glazing to allow natural light without significant impacts on thermal efficiency
- Photovoltaic panels
- Energy efficient lighting
- Water efficient fittings (max. 105 litres/person/day)
- Rainwater harvesting where feasible

6.120 Sustainable design features for the refurbishment of Latchmere House include:

- Fabric efficiency through insulation to ground/basement slabs, roofs and internal wall insulation where appropriate
- Efficient block boiler providing heating and hot water to all units
- Replacement fenestration
- Natural ventilation
- New services for hot water, space heating and lighting
- Energy efficient lighting
- Water efficient fittings (max. 117 litres/person/day)

6.121 A CHP unit is proposed on site, servicing new-build apartments and affordable houses. CHP would not be efficient to extend across the entire site given the quantum of development relative to the site area. Private houses will be equipped with high-efficiency boilers for hot water and space heating. The proposals are considered to comply with RBK policy DM2 and LBR policies CP2 and DM SD 2, which seek on-site provision of energy through CHP or other sustainable means.

## **Trees**

6.122 The Arboricultural Survey confirms that trees located principally to the north of the site, on the approach to Latchmere House, and to the south, within the open grassed area, are considered worthy of protection in amenity and health terms through their TPO and/or conservation area status. However, a number of trees within the centre of the site are of limited amenity value, and in some cases their future is compromised by close proximity to prison buildings, which are due to be demolished.

6.123 The subsequently commissioned Arboricultural Development Report reviewed the proposed layout. The report concludes that the layout respects principal arboricultural features including protected trees and mature trees. The proposals will result in the loss of 38 individual trees and 9 groups, of which 2 trees and 1 group are classed as category U, 6 trees are classed as category B and 30 trees and 8 groups are classed as category C. On balance with the overall planning merits of the proposal, the impact on trees is considered acceptable. Of the 6 trees within category B, there are mitigating factors set out within the Arboricultural Development Report, which justify their loss. The redevelopment facilitates a comprehensive schedule of replanting of suitable species to be undertaken to the overall benefit of the site.

6.124 The report notes that planning conditions can address any need for protection and precautionary measures in relation to trees to be retained.

6.125 The proposals are considered to comply with relevant planning policies of both boroughs. Richmond's Core Strategy policy CP1.D states that 'development should to minimise the use of open land for development and seek to maintain the natural vegetation, especially trees, where possible. The development scheme has been approached in this manner and the masterplan is a sensitive means to optimise development within the setting of a large number of mature trees. RBK policy DM6 seeks tree planting as part of development schemes and this is proposed.

## **Other planning considerations**

### ***Designing out crime***

6.126 The proposals have been designed to reduce any potential for crime or fear of crime. Secured by Design standards will be met where relevant. The scheme has been designed positively to create a safe environment including through passive measures, in accordance with RBK policies DM10 and DM22 and LBR policy CP7.

6.127 All units will comply with Secured by Design standards. Pedestrian routes will have natural surveillance and have been approved in discussions with the Metropolitan Police. Street lighting and security lighting will be provided. Bin stores, cycle stores and rear garden access will be secure.

### ***Accessibility***

6.128 All residential units will be designed to meet Lifetime Homes standards. Four of the affordable/shared ownership units are wheelchair accessible (12%). The market units are adequately sized to enable ready conversion to become wheelchair units. The public realm will be fully compliant with the Equalities Act and designed to achieve equal access to all users. As such, the proposals accord with Richmond policy CP14 and Kingston policies CS 8 and DM10.

### ***Daylighting***

6.129 The proposed development has been reviewed for potential impacts on daylighting to adjoining residential properties, using the established criteria and methodology contained in the Building Research Establishment (BRE) guidelines *Site Layout Planning for Daylight and Sunlight*. Unless a local authority decides to establish its own technical criteria for development within its area, this is the established authority for specialist analysts and local planning authorities alike.

6.130 The BRE guidelines provide different methods of assessment to establish impact on light-sensitive uses. There are different benchmarks beginning with the very basic assessment Vertical Sky Component. The technicalities of this can be reduced initially to a simple angle test of whether any part of the development would break above a line of

25 degrees subtended from the centre line of any adjoining residential window. Such a line equates to a VSC of 27%. Any domestic window which enjoys a VSC of 27% or more is considered by the BRE guidelines to enjoy acceptable levels of daylight.

- 6.131 If this first test is satisfied no further test is required to be carried out. As a rule of thumb this angle represents the relationship between two 2-storey domestic buildings with pitched roofs sitting back from the back edge of the pavement facing each other across a typical domestic suburban street.
- 6.132 None of the windows to habitable rooms within any domestic building adjacent to the site would be faced with a new structure breaking beyond a 25 degree angle at the midpoint of its window. The development therefore suitably safeguards the reasonable amenities of neighbouring properties in daylighting terms.

### ***Refuse and recycling***

- 6.133 Refuse and recycling will be provided in accordance with both boroughs' adopted standards – refer to drawing BKH06\_P\_301 and the Design and Access Statement.

### ***Noise***

- 6.134 The submitted noise assessment concludes that the noise environment for the development will be acceptable, including with regards to ambient noise levels and proposed activities on the site, including proposed plant. As such, the proposals will comply with relevant British Standards as well as LBR's planning policy DM DC 5 and Kingston policies DM1 and DM10.

### ***Archaeology***

- 6.135 On-site archaeological investigation has been carried out. No archaeological remains have been found and it is considered that the ground conditions have been disturbed at some point in the past. There is no evidence to suggest any likelihood of archaeological remains and as such the proposals are considered to comply with policy DM HD 4 of LBR's Development Management Plan and DM12 of Kingston's Core Strategy.
- 6.136 The Archaeological Assessment notes that there are potential remains of local significance, but that these are only likely to be disturbed by severe or widespread below ground impact. Trial trenching was recommended. Whilst it was considered that further archaeological works could take place following planning permission, Berkeley instructed Archaeology South-East to dig evaluation trenches, which took place in August 2013. The Archaeological Evaluation report notes that no archaeological remains were found. The report concluded the lack of surviving subsoil suggests previous truncation across the site that has disturbed any potential archaeology.
- 6.137 The site is not located within an Archaeological Priority Area or Area of Archaeological significance within either borough; however, the site is adjacent to the Ham Common APA within Richmond.

### ***Flooding and drainage***

- 6.138 The proposals are designed to respond to the likely effects of climate change in accordance with RBK policies CS1 and DM4 and LBR policy CP3. The proposals will incorporate sustainable drainage in accordance with RBK policy DM1 and LBR policy DM SD 7.
- 6.139 The site is within a low flood risk area (Flood Zone 1), where development is encouraged by the Sequential Test and by local Development Plan policies. Given the scale of development and the fact that residential use is 'more vulnerable' to flooding, a Flood Risk Assessment is submitted in accordance with RBK policy DM4 and Richmond validation requirements. The FRA confirms that the site is acceptable with regards to flood risk.
- 6.140 Surface water flooding and sewer flooding could affect the site, through overland flow and sewage surcharge; however, there have been no historical instances of surface water, ground water or sewer flooding on the site.
- 6.141 All surface water drainage will be discharged on site. The proposals will incorporate SUDS features, which comprise:
- a swale to east of Latchmere House, incorporating modular storage;
  - an infiltration basin on the green space adjacent Latchmere Close;
  - soakaways to the rear of dwellinghouses, and
  - pervious surfaces for the estate tributary roads and car parking areas.
- 6.142 These features will accommodate a 1 in 100 year flood, accounting for the likely increase in rainfall as a result of climate change. This will ensure that the site will not increase the risk of flooding elsewhere.
- 6.143 Foul sewage will connect with the existing Thames Water sewer and the undertaker has confirmed that there is sufficient foul water capacity.

### ***Biodiversity***

- 6.144 An extended Phase 1 Habitat Survey was undertaken and separate bat survey, stag beetle and badger surveys, by RSK Environmental Ltd.
- 6.145 The bat emergence survey found the presence of one bat entering a building and on this basis RSK have advised that a protected species license will be required prior to commencement of works.
- 6.146 Evidence of stag beetles was not found on site; however, the site is situated within the known Stag Beetle belt and Berkeley are therefore advised that areas of dead wood (referenced in the Stag Beetle letter and map) should either be retained or replaced.
- 6.147 There is some evidence that Badgers may be present in the area. Mitigation measures are recommended by RSK, including appropriate seasonal timing of construction works and potential sett closure, which would require a license from Natural England.
- 6.148 Further advice within the Biodiversity Report included:

- Reptiles and newts are unlikely to be present but this could be possible and a watching brief may be necessary in relation to an identified area of grassland on the site
- Any scrub or tree clearance should occur between September and February to avoid the possibility of disturbing nesting birds

6.149 Subject to undertaking appropriate management and mitigation measures, the proposals are considered acceptable with regards to LBR policy DM OS 5 and RBK policy DM6 and relevant protected species legislation.

### ***Land contamination***

6.150 There is no significant risk of contamination on site and on this basis the proposals are considered acceptable with regards to LBR policy CP1 and RBK policy DM1.

6.151 A Ground Investigation Report was produced by Listers Geotechnical Consultants, based on both a desktop assessment and a site investigation. No significant contamination was encountered; however, a contingency is recommended in case of isolated pockets that could potentially be encountered during construction. It is considered that this can be satisfactorily resolved through a planning condition.

### ***Planning obligations***

6.152 Planning obligations expectations are set out within Kingston's Planning Obligations Strategy SPD (2011) and Richmond's Planning Obligations Strategy SPG (2005). Draft Heads of Terms are set out in Appendix 1. It is anticipated that there will be a degree of discussion regarding appropriate planning obligations and this will also be determined by the viability of the proposals.

6.153 Kingston's Planning Obligations include a category for leisure, culture and community. In discussions with Members it has emerged that there is an aspiration to invest in the Tudor Drive Library, within the vicinity of the site to the south. The library is being improved in order to offer better facilities as a local 'Community Hub'. Community Hubs provide local access to a range of services, including health, housing, advice and information and are referred to within the 'Kingston Plan, Kingston's Vision for 2020'.

6.154 In view of the importance of the community hub within the local area and given that it is reasonable to assume residents within the site may make use of the facility, Berkeley consider that a contribution would be appropriate in planning terms.

## 7 Conclusions

- 7.1 The principal of residential use is acceptable on the site and the development will contribute to meeting both boroughs' housing targets, which have not been met in recent years and are set to increase due to changes proposed to the London Plan.
- 7.2 The loss of vacant former remand centre buildings is not considered problematic in policy terms.
- 7.3 The masterplan layout responds to the site context. The proposal is for a high quality suburban development fully integrating new landscaping with substantial existing green infrastructure and substantially improving the setting of Latchmere House and the Ham Common Conservation Area. The proposals as such will implement key aspects of the councils' Vision for the site as set out in the adopted Planning Brief.
- 7.4 The provision of apartments as part of the overall housing mix is appropriate to the site context given the limited scale and massing of the apartments proposed and the existence of similar scale apartment blocks within the area. Apartments will enable a greater quantum of affordable housing to be provided compared with the alternative lower density scheme, whilst the scheme will also include a number of affordable dwellinghouses. The proposals will provide a good level of on-site affordable housing provision (38% of units), with a tenure mix that reflects adopted planning policies.
- 7.5 The proposals have been carefully designed and sited so as to avoid any material impact on the amenity of neighbours.
- 7.6 The existing and proposed access points will enable the development to operate well within technical highways standards. No material impacts are expected with regards to the operation of the surrounding highways network.
- 7.7 Pedestrian and cyclist permeability through the site is achieved, including routes south towards Tudor Drive, which is an aspiration set out within the adopted Planning Brief.
- 7.8 Car parking will accommodate the needs of the development and avoid issues with on-street parking arising. Cycle parking is provided in accordance with policy and this, together with available public transport, will provide residents with a sustainable choice of transport options.
- 7.9 The new buildings and refurbished Latchmere House will achieve high standards of sustainable design and the development will incorporate a range of SUDS features integrated within the landscaping.
- 7.10 The proposal is a high quality response to the site context and constraints and is an opportunity for key aspects of the joint Planning Brief to be implemented, bringing forward much needed market and affordable housing to the area. As such, the proposals should be granted planning permission.

## **Appendix 1 – Planning obligation Heads of Terms**

## **Proposed development at Latchmere House H M Resettlement Prison**

### **Application for planning permission and conservation area consent**

#### **Draft Heads of Terms – Section 106 Legal Agreement**

The following items may form part of the legal agreement, subject to discussions with the council and financial viability considerations:

#### **London Borough of Richmond upon Thames**

1. Provision of affordable housing (and financial contribution for lower density scheme)
2. Financial contribution towards health care provision
3. Financial contribution towards sports facilities
4. Financial contribution towards the implementation of the local transport strategy

#### **Royal Borough of Kingston upon Thames**

1. Provision of affordable housing (within Richmond) (and financial contribution for lower density scheme)
2. Financial contribution towards health and social care facilities
3. Financial contribution towards community facilities
4. Compliance with the council's employment and training initiatives
5. Financial contribution towards sustainable travel measures
6. Financial contribution towards the council's costs to monitor the proposed Travel Plan



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