haymarket[°]

Proposed Residential Redevelopment
Broom Road, Teddington TWII 9BE
Teddington Riverside
Planning Statement





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1.0 **INTRODUCTION**

Haymarket Media is proposing the redevelopment of their current site that is 1.1 located adjacent to the River Thames and on the north east side of Broom Road. It is within the London Borough of Richmond though the River Thames which it overlooks serves as the boundary between this Borough and the London Borough of Kingston. Planning permission is sought for the following:

> "Demolition of the existing buildings with the exception of Weir Cottage and the erection of part four/part five/part six/part seven storey buildings to provide 213 flats, erection of 6 three storey houses to Broom Road frontage, use of Weir Cottage for residential purposes, provision of 258 car parking spaces at basement and ground level, closure of existing access and provision of two new accesses from Broom Road, provision of publically accessible riverside walk together with cycle parking and landscaping"

- 1.2 This Planning Statement sets out the key planning policy considerations and guidance against which the viability and impacts of this scheme are to be assessed.
- A number of other documents have been submitted in support of the planning 1.3 application. This includes an Environmental Statement (ES). The submission documents are referred to as and when necessary throughout this Statement.

2.0 SITE AND SURROUNDING AREA

2.1 The following provides an overview of the Site, together with its immediate and wider context. Further detail of the character of the site and its context is provided in the Design and Access Statement, which has been submitted as part of the planning application.

The Site

- 2.2 The site has an area of approximately 1.8ha and is bordered to the north by the River Thames. To the north west is the Anglers public house and garden and slipway; to the south west by Broom Road, the houses within it and the St Marys University playing fields. To the south east is The Lensbury Club hotel, sports and leisure facilities.
- 2.3 The site is currently occupied in the main by Haymarket Media as offices with the residual part occupied by Pinewood Studios. Their occupation consists of offices, studios and car parking. The existing buildings range in style, age and mass from the lower buildings fronting Broom Road to the tallest building within the centre of the site. To the north west of the Broom Road frontage is Weir Cottage that dates from the late 19th Century and is a Building of Townscape Merit
- 2.4 The site has its main vehicular access from Broom Road towards the northern end that serves the surface car park. There are other secondary access points further along the Broom Road frontage in front of the former studios.
- 2.5 The site is located approximately 1km from the eastern edge of Teddington Town Centre. Teddington provides a variety of retail outlets and services.
- 2.6 Teddington Station is located 1.5km from the site and the area is served by bus routes. More detail on the accessibility of the site is set out in the Transport Assessment.

2.7 As well as pedestrian access from the west side of the River Thames access to and from the site can also be gained over the Teddington footbridge from the Ham side of the river.

3.0 **PLANNING HISTORY**

- 3.1 There have been a number of minor application proposals in relation to parts of the application site over the years.
- 3.2 In 2003 and 2004 established use certificate were granted on parts of the site a as offices (03/3539/ES191) and as ancillary facilities (04/0135/ES191).
- 3.3 In 2001 an application for the "Retention Of Studio Buildings Together With Redevelopment Of The Site To Provide Two Five And Six Storey Buildings For Uses Within Class B1" was submitted (01/2334). It was however decided to take no further action in September 2004. An earlier mixed use application (00/3162) was similar treated in March 2003.

4.0 PROPOSED DEVELOPMENT

4.1 As noted in Section 1 of this Statement, the proposal is for the:

> "Demolition of the existing buildings with the exception of Weir Cottage and the erection of part four/part five/part six/part seven storey buildings to provide 213 flats, erection of 6 three storey houses to Broom Road frontage, use of Weir Cottage for residential purposes, provision of 258 car parking spaces at basement and ground level, closure of existing access and provision of two new accesses from Broom Road, provision of publically accessible riverside walk together with cycle parking and landscaping"

Proposed use

4.2 The development would constitute a stepped scheme with basement to provide 213 flats and 6 houses, a total of 219 residential units.

Building Layout

4.3 The development comprises of four pavilion buildings arranged between the River Thames and Broom Road. In addition there is a block fronting Broom Road together with a terrace of six houses.

Access

4.4 The pedestrian access is from Broom Road. This will provide access to the body of the scheme and for the first time access to the river frontage. A pair of access/egress points will also provide for vehicular access to the basement parking and surface level parking.

Car and Cycle Parking

- 4.5 The development provides for 258 parking spaces for the residential units. The parking is provided primarily in a basement car park with some surface level parking.
- 4.6 There is the provision for cycle spaces throughout the scheme for residents.

External Amenity

- All the residential units have been provided with a relevant level of private 4.7 amenity space in the form of balconies or terraces.
- 4.8 There is access to communal amenity space and children's playspace of within the site. There is also the provision of a new riverside walk, cycle and pedestrian paths.

5.0 SUMMARY OF CONSULTATION

Consultation with Statutory Authorities

- 5.1 Formal pre-application advice has been sought from London Borough of Richmond on a number of occasions throughout the development of the proposal between Spring 2013 and the submission date.
- A pre-application meeting was also held with the GLA on 28th October 2013 with 5.2 a further meeting on site with them in November 2013. Formal pre-application advice was received in December 2013. The pre-application advice received from the GLA has been fully reviewed, with the scheme amended in line with that advice where appropriate.
- 5.3 Public consultation was held over two separate two days events in July 2013 and Octobers 2013. The results of the consultation are summarised in the Statement of Community Involvement (SCI).

6.0 PLANNING POLICY CONSIDERATIONS

- 6.1 In accordance with Section 38 (6) of the Planning and Compulsory Purchase Act 2004, planning applications should be determined in accordance with the development plan unless other material considerations indicate otherwise.
- 6.2 The relevant Development Plan for the site is:
 - The National Planning Policy Framework (NPPF)
 - The London Plan (2011) and Revised Early Minor Alterations (2013)
 - Richmond Core Strategy
 - Richmond Development Management Document (MDD)
 - Adopted Supplementary Planning Documents including the Design Quality, Residential Development Standards and Sustainable Construction **SPD**
- 6.3 Other relevant policy documents are:
 - Draft Further Alterations to the London Plan January 2014
 - Draft Site Allocations DPD (2013)
 - Planning Brief Teddington Studios

Designations

- 6.4 The site has the following planning policy designations:
 - Part of the site is with Teddington Lock Conservation Area
 - Weir Cottage is a BTM

• Thames Policy Area

Draft Site Allocations

- 6.5 In October 2103 the Council published its draft Site Allocations DPD. This was the subject of public consultation in October/November 2013.
- 6.6 The document proposes the following designation:

TD 4 Teddington Studios, Broom Road, Teddington Proposal

Subject to re-provision of offices redevelopment for residential, including affordable units, open space and riverside walk

Employment Use

- 6.7 The NPPF indicates in paragraph 22 that "Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities".
- 6.8 Policy 4.2 of the London Plan deals with offices. It states:

Strategic

- A The Mayor will and boroughs and other stakeholders should:
 - a support the management and mixed use development and redevelopment of office provision to improve London's competitiveness and to address the wider objectives of this Plan, including enhancing its varied attractions for businesses of different types and sizes including small and medium sized enterprises

and

c encourage renewal and modernisation of the existing office stock in viable locations to improve its quality and flexibility

6.9 Policy CP19 deals with Local Business. It states:

A diverse and strong local economy will be supported by:

- 19.A Retaining land in employment uses for business, industrial or storage.
- 19.B Requiring development likely to generate significant amounts of travel to be located in areas highly accessible to public transport, with the largest office developments located in Richmond and Twickenham town centres.
- 19.C Encouraging the provision of small units.
- 19.D Requiring mixed use schemes to retain the level of existing employment floorspace.

However the inclusion of residential use within mixed use schemes will not be appropriate where it would be incompatible with established employment uses on neighbouring sites and prejudicial to their continued operation.

- 19.E Encouraging major new development to take account of requirements set out in the Planning Obligations Strategy (or any revision) in relation to training and enterprise
- 6.10 DM Policy DM EM1 deals with Development for Offices, Industrial, Storage and Distribution uses. It states:

Development for Offices, Industrial, Storage and Distribution uses

Planning permission will normally be approved for appropriate employment development.

The Council will take account of the following factors:

- a) the accommodation should be flexible & suitable to meet future needs especially to provide for the requirements of local businesses and small firms;
- b) the scale, bulk and appearance of the proposal should be compatible with the character of its surroundings;
- c) the development must not significantly harm the amenities of nearby occupiers nor cause adverse environmental impact on the surrounding area;
- d) the scale of development should be compatible with the level of existing or potential public transport accessibility, and the on-street parking situation. Where additional infrastructure is required due to the scale of the development, such a development will be required to fund the necessary infrastructure to support it;
- e) the development should comply with the Council's transport, access, servicing, car and cycle parking standards and policies.

In addition

Larger scale new B1a Office development should generally be within the five main town centres.

Industrial, storage and distribution development, and improvement and expansion of such premises will normally be permitted, subject to a)-e) above. However, in considering such proposals the Council will take into account the need, if any, to improve the physical environment of the area.

6.11 DM Policy EM 2 deals with the Retention of Employment. It states:

The Council seeks to retain land, sites and buildings which were last used for employment purposes, in employment use. The use of employment land for other purposes will only be permitted where:

- (a) There is satisfactory evidence of completion over an extended period of time of a full and proper marketing exercise of the site at realistic prices both for the existing use and for redevelopment (if appropriate) for other employment uses; or suitable alternative evidence; and either
- (b) A sequential approach has been applied to the development of the site as follows:
- i) solely employment-based redevelopment;
- ii) mixed-use or other alternative employment creating uses, where the employment floorspace is retained. Such sites should maximise the amount of affordable housing provided as part of the mix;
- iii) maximum provision of affordable housing in accordance with CP19;
- Or (c): The location has such exceptionally severe site restrictions due to very poor access and servicing arrangements that its continued employment use would be inappropriate.

Proposals for Mixed Use schemes must maintain or improve the amount of employment floorspace on site. Each proposal will be considered on its merits and the Council will take account of the following factors when considering mixed use applications:

- i) the amount of employment floorspace;
- ii) the type and mix of uses as existing and proposed;
- iii) likely access, parking and traffic implications;
- iv) compatibility with the policies for other land uses;
- v) design quality;
- vi) the type, size and tenure of residential provision which should be in accordance with policies and guidance in order to maximise the amount of affordable housing provision.

If the above steps have been applied and the Council accepts the site is unsuitable for continued employment or commercial use, or other employment generating uses then affordable housing should be maximised.

Employment Use Assessment

6.12 The proposal is to redevelop what is currently an employment site. To address policy considerations on the retention of employment floorspace within the Borough the proposal is to relocate the applicants existing use to another site locally. This will enable the retention of the current jobs within the area.

6.13 The proposed relocation of the applicant to new purpose built premises will not only retain existing jobs but enable the increase in employment levels. This approach is supported by the proposed designation of the site by the Council.

Residential Land Use

- 6.14 The NPPF states that boroughs are expected to deliver a "wide choice" of homes that offer a mix of "sizes, types and tenures" and advocates the implementation of larger scale developments, where appropriate, in order to meet local housing targets.
- 6.15 The London Plan sets out the strategic housing requirement for London and for each Borough. Table 3.1 sets out the Borough targets that for Richmond is 2,450 additional dwellings by 2021 or 245 dwellings/annum. The Draft Further Alterations (2014) proposes increasing this to 315 dwellings/annum.
- 6.16 Policy 3.3 explains the need for each London Borough to increase their housing stock in order to meet future change in population and to provide Londoners with a proper choice of housing. The Policy explains that the re-use of brownfield sites, mixed use schemes and the intensification of land should be encouraged.
- 6.17 The timing of the adoption of the Core Strategy reflects a slightly earlier version of the London Plan's housing targets. Through Policy CS 19 this states "for the ten year period between 1 April 2007 and 31 March 2017, an additional 2,700 dwellings (Alterations to the London Plan, Dec 2006), annualised as 270 dwellings per year. In the ten years from March 2017, indicative capacity is expected to be in the range of 150-330 dwellings a year. An early alteration to the target contained in this strategy will be brought forward to reflect the updated London wide Housing Capacity Study /SHLAA".

6.18 In Policy 14B the plan suggests an additional 700-800 units by 2017 in the Teddington and Hamptons area.

Residential Land Use Assessment

- 6.19 The proposal will provide for 217 residential units and therefore contribute significantly towards housing supply in both the Teddington area and the overall Borough.
- 6.20 This factor has lead to the site being proposed through the draft Site Allocations DPD for housing development.

Affordable Housing

- 6.21 The NPPF states that it is a requirement that developments address the current and future housing demands of the local population. In particular, there is a requirement for these developments to provide a degree of affordable housing.
- 6.22 The London Plan states that Local Authorities must ensure there are enough homes to meet the needs of Londoners at all stages of their lives and whatever their circumstances. This is supported by Policy 3.8, which explains that Londoners must be able to have a choice of homes to live in that cover different sizes, prices ranged and tenures. These houses should be accessible to both current and future communities.
- 6.23 Policy 3.9 goes on to say that development must be designed to cultivate mixed and well balanced communities and to discourage segregation. This can be achieved through the incorporation of heterogeneous housing tenures, sizes and costs.
- 6.24 Policy 3.11 explains that affordable housing in a Borough should be maximised. London wide, 182,000 affordable homes should be delivered by 2017 with a minimum annual construction of 13,200 affordable homes. Priority being given to affordable family homes.
- 6.25 Core Strategy Policy CP15 deals with Affordable Housing. It states:

15.A Housing provision is expected to include a range of housing to meet the needs of all types of households.

Over the LDF period the Council:

- i. expects 50% of all new units will be affordable housing, with a tenure mix of 40% housing for social rent and 10% intermediate housing.
- ii. expects that the affordable housing mix should reflect the need for larger social rented family units and the Sub-Regional Investment Framework requirements.

The Council will seek to bring forward affordable housing through development of new units, purchase of property in or outside the borough and through rent deposit schemes.

- 15.B Some form of contribution towards affordable housing will be expected on all new housing sites. The contribution towards affordable housing on sites involving new-build housing will be as follows:
- i. on sites below the threshold of 'capable of ten or more units gross', a financial contribution to the Affordable Housing Fund commensurate with the scale of development. The amount involved will be set out in the Development DPD and will be reviewed annually.
- ii. on sites capable of ten or more units gross, at least 50% on-site provision. Where possible, a greater proportion than 50% affordable housing on individual sites should be achieved.
- 6.26 The supporting text advises that "Where viability is an issue in providing affordable housing, the onus will be on developers to produce a financial assessment showing the maximum amount that could be achieved on the site".

Affordable Housing Assessment

The proposal is for a total of 219 residential units (760 habitable rooms). The 6.27 proposal makes provision for 12 affordable units that that comprise 5.5% of the total number of proposed units.

6.28 The application is supported by a Viability Appraisal that demonstrates that this is the maximum amount of affordable housing that can be provided on the application site.

Housing Mix

- 6.29 London Plan Policy 3.8 states the requirements for new dwellings to provide residents with a "genuine choice of homes" in a mix of housing sizes and tenures. Family housing is defined as any unit with 3 or more bedrooms. In order to meet current demand, developments across London should prioritise affordable family units.
- 6.30 Core Strategy Policy CP14D deals with Housing Standards and Types. It states that "The private sector element of any development will include an appropriate number of small (1-bed) units, depending on location. This would be at least 25%, rising to the great majority (at least 75%) in more sustainable locations, such as town centres and other areas with high public transport accessibility and with good access to facilities".
- 6.31 DM Policy DM HO4 also deals with Housing Mix and Standards. It states:

Development should generally provide family sized accommodation, except within town centres where a higher proportion of small units would be appropriate. The housing mix should be appropriate to the location.

Housing Mix Assessment

6.32 The scheme proposes a mix of dwelling sizes.

	No. 1 beds	No. 2 beds	No. 3 beds	No. 4 beds
Market	41	95	65	6
Affordable	4	8	0	0

6.33 The proposal therefore proposes a wide range of dwelling types from one bedroom flats through to four bedroom houses. Of these 21% are one bedroom units reflecting the Core Strategy policy and the location of the site.

Housing Density

6.34 London Plan Policy 3.4 states that new developments should be of a type and density that respects the capacity of the existing transport network. Larger developments should be located so as to reduce the need to travel as much as is possible. The table below illustrates the recommended densities (habitable rooms per hectare) of residential developments with regards to their proximity to public transport.

Setting	Public Transport A	Public Transport Accessibility Level (PTAL)			
	0 to 1	2 to 3	4 to 6		
Suburban	150-200 hr/ha	150-250 hr/ha	200-350 hr/ha		
3.8-4.6 hr/unit	35-55 u/ha	35-65 u/ha	45-90 u/ha		
3.1-3.7 hr/unit	40-65 u/ha	40-80 u/ha	55-115 u/ha		
2.7-3.0 hr/unit	50-75 u/ha	50-95 u/ha	70-130 u/ha		
Urban	150-250 hr/ha	200-450 hr/ha	200-700 hr/ha		
3.8-4.6 hr/unit	35-65 u/ha	45-120 u/ha	45-185 u/ha		
3.1-3.7 hr/unit	40-80 u/ha	55-145 u/ha	55-225 u/ha		
2.7-3.0 hr/unit	50-95 u/ha	70-170 u/ha	70-260 u/ha		
Central	150-300 hr/ha	300-650 hr/ha	650-1100 hr/ha		
3.8-4.6 hr/unit	35-80 u/ha	65-170 u/ha	140-290 u/ha		
3.1-3.7 hr/unit	40-100 u/ha	80-210 u/ha	175-355 u/ha		
2.7-3.0 hr/unit	50-110 u/hr	100-240 u/ha	215-405 u/ha		

Residential density matrix, London Plan

- 6.35 It is important to note, as the supporting paragraph for London Plan Policy explains, the density ranges are incredibly broad and should not be applied to development "mechanistically". Site specific factors such as housing demand, Local Area Plans, design and context must be taken into account.
- 6.36 Core Strategy Policy CP14 states "The density of residential proposals should take into account the need to achieve the maximum intensity of use compatible with local context, while respecting the quality, character and amenity of established neighbourhoods and environmental and ecological policies. The London Plan consolidated with Alterations since 2004 Density Matrix and other policies will be taken into account to assess the density of proposals".

6.37 The supporting text advises that "While The London Plan consolidated with Alterations since 2004 density matrix provides general guidance, local factors, such as proximity to facilities and to public transport routes, and the character of the surrounding area, will be taken into account in reaching the appropriate density for a particular site".

Housing Density Assessment

- 6.38 The density of the proposed scheme is 422 habitable rooms per hectare in an area mainly with a PTAL 2. The site is currently developed in an urban manner. The proposed density is in excess of that suggested in the London Plan.
- 6.39 However, it is important to note the context of the site and the level of development/floorspace currently on the site.

Internal Space Standards

6.40 Policy 3.5 of the London Plan outlines the design requirements put upon all new houses in London, outlining that they must be attractive and spacious, "generally conforming with" minimum space standards as shown in the table below. Dwellings within the development range from 1 bed flats up to 4 beds houses. Each dwelling complies with the GIA space standards outlined in the London plan and in many cases exceeds the relevant standard.

	Dwelling type (bedroom (b)/persons-bedspaces (p))	GIA (sq m)
Flats	1p	37
	1b2p	50
	2b3p	61
	2b4p	70
	3b4p	74
	3b5p	86
	3b6p	95
	4b5p	90
	4b6p	99
2 storey houses	2b4p	83
	3b4p	87
	3b5p	96
	4b5p	100
	4b6p	107
3 storey houses	3b5p	102
	4b5p	106
	4b6p	113

Minimum overall dwelling size, London Plan

6.41 The Council's Residential Development Standards SPD (2010) also sets out These are less as the document pre-dates the residential space standards. London Plan and Mayors Housing SPG.

Space Standards Assessment

- 6.42 As can be seen in the Design and Access Statement and the submitted drawings, each unit fully complies and in many cases exceeds the minimum required space standards of the London Plan and Mayors Housing SPG. In meeting these standards they exceed those in the Councils SPD.
- 6.43 This ensures that the highest quality of internal amenity is provided for future residents, contributing valuably to the Borough's market and affordable housing stock.

Privacy and Neighbourliness

6.44 The Mayors Housing SPG states:

> "In the past, planning guidance for privacy has been concerned with achieving visual separation between dwellings by setting a minimum distance of 18 - 21m between facing homes (between habitable room and habitable room as opposed to between balconies or terraces or between habitable rooms and balconies/terraces). These can still be useful yardsticks for visual privacy, but adhering rigidly to these measures can sometimes unnecessarily restrict density"

6.45 Policy DM DC 5 deals with Neighbourliness, Sunlighting and Daylighting. It states:

> "In considering proposals for development the Council will seek to protect adjoining properties from unreasonable loss of privacy, pollution, visual intrusion, noise and disturbance.

> To protect privacy, for residential development there should normally be a minimum distance of 20 m between main facing windows of habitable rooms.

The Council will generally seek to ensure that the design and layout of buildings enables sufficient sunlight and daylight to penetrate into and between buildings, and that adjoining land or properties are protected from overshadowing in accordance with established standards".

6.46 Neighbourliness and Privacy and spaces between buildings are also addressed in the Residential Development Standards SPD, sections 3.1 and 3.2.

Privacy and Neighbourliness Assessment

- 6.47 The proposal achieves acceptable levels of separation between the proposed main blocks and between the Broom Road end of those blocks and the proposed buildings that front Broom Road. This will therefore not result in any adverse impact on the future living conditions of residents through overlooking.
- 6.48 The application is supported by a Sunlight and daylight Assessment that considers the relationship between the buildings within the scheme and also as to any adverse impact on surrounding buildings. The assessment considers that there will be no adverse impact arising form the proposal.

Amenity

- 6.49 The NPPF states that developments must identify and address specific needs and deficits of open space, play space, sports and recreational facilities in the local area.
- 6.50 The London Plan Policy 3.6 addresses those residential schemes that are likely to house young people and children. Such schemes will be resisted where they fail to make a provision for informal recreation, open spaces and good quality, well designed and accessible play spaces. Policy 7.18 follows on from this, stating that all developments should provide, or else make a contribution towards an adequate and accessible level of green and open space for existing and future residents.
- 6.51 Further to the provision of accessible play and informal spaces, the Mayor's Children and Young People's Play and Informal Recreation SPG explains that, on

developments featuring 10 or more units, the recommended minimum provision of play space for those developments containing children should be 10sqm per child. If facilities are to be provided offsite, then they should still be within 400 metres of the development for 5-11 year olds or within 800 metres for 12 plus age groups.

- 6.52 London Plan Policy 3.5 states that all new dwellings should take into account the relationship between density and the "provision of public, communal and open spaces". Each resident should have access to a high quality amenity space that can be used safely without the fear of crime.
- 6.53 The Mayor's Housing SPG explains that a minimum of 5sqm private outdoor space should be provided for 1-2 person dwelling with a further 1sqm for every additional occupant.
- 6.54 At the local level DM Policy DC 6 deals with Balconies and Upper Floor Terraces. It states:

"Purpose built, well designed and positioned balconies or terraces are encouraged where new residential units are on upper floors. They should be:

- sufficiently deep to allow adequate access and circulation around furniture.
- preferably located next to a dining or living space
- preferably receive direct sunlight
- designed to provide some shelter and privacy to neighbouring properties, either by using screens or by setting the balcony back within the façade
- balustrades designed to screen stored items from view
- designed for security and safety

The addition of balconies and upper floor terraces to existing properties will not generally be permitted unless the above apply and they do not adversely affect neighbourliness (see Policy DM DC 5 'Neighbourliness, Sunlighting and Daylighting')".

6.55 Policy DM OS 6 deals with Public Open Space. It states:

"Public Open Space will be protected and enhanced. Improvement of the openness and character of the Public Open Space including measures to allow for convenient access for all residents will be encouraged where appropriate.

New Public Open Space with convenient access for all will be provided where possible, or existing areas made more accessible, particularly in areas poorly provided with public open space. These will be linked to the wider network of open spaces. Financial contributions will be required for most new developments towards the provision of, or improvements to public open space.

Larger new developments will be expected to include open space provision within the scheme, with the aim to strike a balance between private, semiprivate and public open space provision".

6.56 Policy DM OS 7 deals with Children's and Young People's Play Facilities. It states:

"Children's and young people's play facilities will be protected and the improvement and enhancement of existing facilities and their accessibility will be encouraged. New children's and young people's play facilities will be provided or existing spaces enhanced where possible, particularly in areas poorly provided with play facilities.

New developments must assess the needs arising from the new development by following the benchmark standards outlined in the Mayor's Supplementary Planning Guidance on Providing for Children and Young People's Play and Informal Recreation (see para 4.1.27).

All developments with an estimated child occupancy of ten children or more should seek to make appropriate play provision to meet the needs arising from the development. Where this provision cannot be met on-site or for developments yielding less than 10 children, the Council will seek an equivalent financial contribution to fund off-site provision".

6.57 The Residential Development Standards SPD provides detailed guidance and states "Sufficient on site outdoor amenity space must be provided in new residential developments. To provide adequate private amenity space, the Council will encourage a minimum of 5 sqm of private outdoor space for 1-2 person dwellings plus an extra 1 sqm should be provided for each additional occupant..... Ground level family units (of 3 or more bedrooms) within a block of flats should have larger private amenity spaces. Flats at upper levels may share a community garden and have a private balcony area, if of an acceptable design. In subdivided buildings, useable and accessible private outdoor space should be provided for as many new units as possible".

Amenity Assessment

- 6.58 All of the units have direct access to private amenity space in the form of balconies and terraces that all meet the Mayor's Housing SPD and Boroughs SPD standards. In addition there is the extensive private communal spaces adjoining Blocks A and C, semi-public communal amenity space and young persons play space area within the overall development.
- 6.59 Accordingly the quality of the internal space is enhanced by the quality and quantum of the external space.

Design

- 6.60 The NPPF stresses the importance of good design. It emphasises that design is a key requirement in all developments due to its contribution towards making places better for people.
- 6.61 The London Plan Policy 3.2 says that developments should be designed that would enable Londoners to live in well designed homes, appropriately sized, energy efficient, warm, dry and safe. Further, Policy 7.6 - Architecture introduces a number of key design guidelines to which a development would

have to adhere, in order to better increase its chances of securing planning permission. A development should:

- Be of the highest architectural quality; a.
- b. Be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm;
- c. Comprise details and materials that complement, not necessarily replicate, the local architectural character;
- d. Not cause unacceptable harm to the amenity of surrounding land and buildings;
- e. Incorporate best practice in resource management and climate change;
- f. Provide high quality indoor and outdoor spaces;
- g. Be adaptable to different activities and land uses, particularly at ground level;
- h. Meet the principles of inclusive design;
- i. Optimise the potential of sites.
- 6.62 Policy 7.2 of the London Plan addresses inclusive design and notes that developments should be designed so as they can "be used safely and easily by all regardless of disability".
- 6.63 London Plan Policy 7.4 explains how developments should relate to the existing site context. New buildings should respect the character and existing grain of

the area. They should provide a "human scale" and go towards enhancing and encouraging positive activity at street level activity.

6.64 At the local level policy DM DC 1 deals with Design Quality. It states:

> "New development must be of a high architectural and urban design quality based on sustainable design principles. Development must be inclusive, respect local character including the nature of a particular road, and connect with, and contribute positively, to its surroundings based on a thorough understanding of the site and its context.

> In assessing the design quality of a proposal the Council will have regard to the following:

- compatibility with local character including relationship to existing townscape and frontages, scale, height, massing, proportions and form
- sustainable development and adaptability, subject to aesthetic considerations
- layout and access space between buildings and relationship to the public realm
- detailing and materials"

Design Assessment

- 6.65 The proposed development is a high quality development in a landscaped waterside setting. The evolution of the design is addressed in the Design and Access Statement that demonstrates that the final design has evolved through discussions with the Council and also with stakeholders.
- 6.66 High quality design is a priority in the proposed scheme. Every unit meets or else exceeds the minimum spatial standards, has a suitable provision of amenity space and is designed to maximise light and accessibility. Many of the flats have more then one aspect. Further, the appearance of the building and materials used in its construction has been carefully designed to complement its existing locality and relationship to the River Thames.

- 6.67 The development comprises of a number of distinct blocks, designed and oriented as such to make optimum use of the site. The overall development of the site is of a scale to reflect the existing built environment on the site and the design guidance on height in the sites Planning Brief.
- 6.68 The proposals meet London Plan policies, the Mayors Housing SPG Design guidance and the policies of the Council and their guidance in their Design Quality SPD.

Environment

6.69 London Plan Policy 7.24 deals with the Blue Ribbon Network. It states:

"Strategic

Α The Blue Ribbon Network is a strategically important series of linked spaces. It should contribute to the overall quality and sustainability of London by prioritizing uses of the waterspace and land alongside it safely for water related purposes, in particular for passenger and freight transport. Regard should be paid to the Thames River Basin Management Plan".

6.70 Policy 7.27 deals with the use of the Blue Ribbon Network for supporting Infrastructure and recreational use. It states:

"Planning decisions

A Development proposals should enhance the use of the Blue Ribbon Network, in particular proposals:

a that result in the loss of existing facilities for waterborne sport and leisure should be refused, unless suitable replacement facilities are provided

b should protect and improve existing access points to (including from land into water such as slipways and steps) or alongside the Blue Ribbon Network (including paths). New access infrastructure into and alongside the Blue Ribbon Network will be sought

c should protect waterway support infrastructure such as boatyards, moorings, jetties and safety equipment etc. New infrastructure to support water dependent uses will be sought. New mooring facilities should normally be off line from main navigation routes, i.e. in basins or docks".

6.71 Local Policy DM OS2 deals with Metropolitan Open Land (MOL). Whilst the site is not within MOL the policy state "When considering developments on sites outside Metropolitan Open Land, any possible visual impacts on the character and openness of the Metropolitan Open Land will be taken into account".

Heritage

6.72 Policy DM HD1 deals with 'Conservation Areas' designation, protection and enhancement'. It states:

> "The Council will continue to protect areas of special significance by designating Conservation Areas and extensions to existing Conservation Areas using the criteria as set out in PPS 5 and as advised by English Heritage.

> The Council will prepare a Conservation Area Appraisal and Management Plan for each Conservation area, these will be used as a basis when determining proposals within or where it would affect the setting of, Conservation Areas together with other policy guidance.

> Buildings or parts of buildings, street furniture, trees and other features which make a positive contribution to the character, appearance or significance of the area should be retained. New development (or redevelopment) or other proposals should conserve and enhance the character and appearance of the area".

6.73 Policy DM HD 2 deals with the Conservation of Listed Buildings and Scheduled Ancient Monuments. It states:

"The Council will require the preservation of Listed Buildings of special architectural or historic interest and Ancient Monuments and seek to ensure that they are kept in a good state of repair by the following means:

- 1. consent would only be granted for the demolition of Grade II Listed Buildings in exceptional circumstances and for Grade II* and Grade I Listed Buildings in wholly exceptional circumstances following a thorough assessment of their significance;
- 2. retention of the original use for which the listed building was built is preferred.

Other uses will only be considered where the change of use can be justified, and where it can be proven that the original use cannot be sustained;

- 3. alterations and extensions including partial demolitions should be based on an accurate understanding of the significance of the asset including the structure, and respect the architectural character, historic fabric and detailing of the original building. With alterations, the Council will normally insist on the retention of the original structure, features, material and plan form or features that contribute to the significance of the asset. With repairs, the Council will expect retention and repair, rather than replacement of the structure, features, and materials of the building which contribute to its architectural and historic interest; and will require the use of appropriate traditional materials and techniques;
- 4. using its legal powers to take steps to secure the repair of Listed Buildings, where appropriate;
- 5. protecting the setting of Ancient Monuments and Listed Buildings where proposals could have an impact;
- 6. taking a practical approach towards the alteration of Listed Buildings to comply with the Disability Discrimination Act 2005 and subsequent

amendments, provided that the buildings interest is not harmed, using English Heritage advice as a basis".

6.74 Policy DM HD 3 deals with Buildings of Townscape Merit. It states:

"The Council will seek to ensure and encourage the preservation and enhancement of Buildings of Townscape Merit and will use its powers where possible to protect their significance, character and setting, by the following means:

- 1. consent will not normally be granted for the demolition of Buildings of Townscape Merit;
- alterations and extensions should be based on an accurate understanding of the significance of the asset including the structure, and respect the architectural character, and detailing of the original building. The structure, features, and materials of the building which contribute to its architectural and historic interest should be retained or restored with appropriate traditional materials and techniques;
- 3. any proposals should protect and enhance the setting of Buildings of Townscape Merit;
- 4. taking a practical approach towards the alteration of Buildings of Townscape Merit to comply with the Disability Discrimination Act 2005 and subsequent amendments, provided that the building's special interest is not harmed, using English Heritage advice as a basis".

6.75 Policy DM HD 4 deals with Archaeological Sites. It states:

The Council will seek to protect, enhance and promote its archaeological heritage (both above and below ground), and will encourage its interpretation and presentation to the public. It will take the necessary measures required to safeguard the archaeological remains found, and refuse planning permission where proposals would adversely affect archaeological remains or their setting.

6.76 A sliver of the edge of the site within the Teddington Lock Conservation Area and therefore the policy is relevant and addressed in more detail in the Heritage Statement. Weir Cottage on the Broom Road frontage is a BTM.

Heritage Assessment

6.77 The detailed assessment of the proposal against these policies is dealt with the Heritage Statement. This concludes that there will be no adverse impact upon any heritage assets.

Accessibility and Lifetime Homes

6.78 The London Plan Housing SPG affirms that all new developments should have 10% of new units fully wheelchair accessible. These wheelchair accessible units must be distributed across all tenures and evenly spread throughout the development. Further, all new dwellings must adhere to the criteria of Lifetime Homes. This is a view shared by Policy CP14E that states that "All housing should be built to Lifetime Homes standards and 10% of all new housing should be to wheelchair standards".

Accessibility and Lifetime Homes Assessment

6.79 All the proposed dwellings are designed to the GLA, SPD and CSH level 4 as well as to Life Time Homes Standards and all feature flush entry, flush balconies and all best practice. Internal partitions are conceived to be non-load bearing thereby optimising the potential for flexible rearrangement to suit future trends.

Sustainability

6.80 The London Plan Policy 5.2 states that all developments must be designed in a way that minimises carbon emissions with Policy 5.3 going on to say that sustainable design, construction and operation must be integral to the overall scheme. Major development proposals should achieve the following sustainable design principles:

- Minimising carbon dioxide emissions across the site; a.
- b. Avoiding internal overheating;
- Efficient use of natural resources; c.
- d. Minimising pollution;
- e. Minimising the generation of waste and maximising reuse or recycling;
- f. Avoiding impacts from natural hazards (such as flooding);
- Ensuring developments are comfortable and secure for users; g.
- h. Securing sustainable procurement of materials, using local supplies where feasible;
- i. Promoting and protecting biodiversity and green infrastructure.
- 6.81 London Plan Policy 5.7 deals with Renewable Energy. It states:

"Strategic

A The Mayor seeks to increase the proportion of energy generated from renewable sources, and expects that the projections for installed renewable energy capacity outlined in the Climate Change Mitigation and Energy Strategy and in supplementary planning guidance will be achieved in London.

Planning decisions

B Within the framework of the energy hierarchy (see Policy 5.2), major development proposals should provide a reduction in expected carbon dioxide emissions through the use of on-site renewable energy generation, where feasible".

- 6.82 Policy 5.9 requires major development proposals to demonstrate how the design, materials, construction and operation of the development would minimise overheating and also meet its cooling needs.
- 6.83 Green roofs, walls and site greening should be encouraged in all new developments, as stated within London Plan Policy 5.11.
- 6.84 Core Strategy Policy CP 1 deals with 'Sustainable Construction' and states:

"The policy seeks to maximise the effective use of resources including land, water and energy, and assist in reducing any long term adverse environmental impacts of development. Development will be required to conform to the Sustainable Construction checklist, including requirement to meet the Code for Sustainable Homes level 3 (for new homes), Ecohomes "excellent" (for conversions) or BREEAM "excellent" (for other types of development). This requirement will be adjusted in future years through subsequent DPDs, to take into account the then prevailing standards in the Code for Sustainable Homes and any other National Guidance, and ensure that these standards are met or exceeded".

6.85 Development Management Policy SD1 also deals with 'Sustainable Construction'.

> "All development in terms of materials, design, landscaping, standard of construction and operation should include measures capable of mitigating and adapting to climate change to meet future needs.

> New buildings should be flexible to respond to future social, technological and economic needs by conforming to the Borough's Sustainable Construction Checklist SPD.

> New homes will be required to meet or exceed requirements of the Code for Sustainable Homes Level 3.

> They also must achieve a minimum 25 per cent reduction in carbon dioxide emissions over Building Regulations (2010) in line with best practice from 2010 to 2013, 40 per cent improvement from 2013 to 2016, and 'zero carbon' standards from 2016. It is expected that efficiency

measures will be prioritised as a means towards meeting these targets. These requirements may be adjusted in future years to take into account the then prevailing standards and any other national guidance to ensure the standards are met or exceeded".

- 6.86 This policy is supported by the Councils Sustainable Construction Checklist SPD.
- 6.87 Policy DM SD 5 deals with Living Roofs. It states:

"Living roofs should be incorporated into new developments where technically feasible and subject to considerations of visual impact. The onus is on the applicant/developer for proposals with roof plate areas of 100sqm or more to provide evidence and justification if a living roof cannot be incorporated. The aim should be to use at least 70% of any potential roof plate area as a living roof.

The use of living roofs in smaller developments, renovations, conversions and extensions is encouraged and supported".

Sustainability Assessment

6.88 The application proposal is supported by an Energy and Sustainability Assessment and the Sustainability Checklist, so as to meet the policies in the London Plan and at the local level. This demonstrates that the development will achieve a total annual CO2 savings for the development from the proposed measures of 48.6% over the base line Building Regulations 2010 target, which meets policy 5.2 of the London Plan. In addition a Code for Sustainable Homes Pre-Assessment has been conducted by a certified assessor for the proposed development and this indicates that a Level 4 rating can be achieved.

Accessibility/Parking

6.89 The NPPF affirms that new developments should relate to existing sustainable transport hubs. It states that schemes generating "significant movement" should be located as such, to minimise car use and maximise sustainable modes of transport.

- 6.90 London Plan Policy 6.1 encourages the integration of transport and development, stating that schemes should be located as such to reduce the need to travel, particularly by car, and should overall, improve the accessibility of public transport, walking and cycling.
- 6.91 Policy 6.13 of the London Plan explains that whilst new development must be encouraged, there must be measures in place to prevent a reliance on cars where cycles or public transport could be used instead. The car parking provision must be proportional to the PTAL rating of a development.
- 6.92 The Addendum to Chapter 6 in the London Plan explains in detail the requirements for disabled parking on new developments, stating that developments should provide at least one parking space for blue badge holders that are as close as practical to the main entrance of the building.
- 6.93 The London Plan Housing Guidance SPG provides guidance on the number of parking spaces required per habitable room, in relation to PTAL rating. In an area with a PTAL of 2-4, up to one space should be provided per unit with two or less beds and up to 1.5 spaces should be provided for units with 3 or more beds.
- 6.94 At the local level Policy DM TP 2 deals with Transport and New Development. It states:

"The impact of new development on the transport network will be assessed against other plan policies and transport standards. All planning applications for major developments should be accompanied by a Transport Assessment and for smaller developments should be accompanied by a Transport Statement. Matters to be included are set out in DofT/TfL guidance.

Developers should also take account of the Council's SPD on Transport Standards".

- 6.95 Appendix 4 of the Development Management DPD sets out the Councils Parking The standards for residential development are set out in this Standards. Appendix and vary slightly from those in the London Plan.
- 6.96 Policy DM TP 8 deals with Off Street Parking - Retention and New Provision. It states:

"Developments, redevelopments, conversions and extensions will have to demonstrate that the new scheme provides an appropriate level of off street parking to avoid an unacceptable impact on on-street parking conditions and local traffic conditions.

A set of maximum car parking standards and minimum cycle parking standards are set out in Appendix Four - Parking Standards 'Appendix Four - Parking Standards' for all types of development, these take into account bus, rail and tube accessibility as well as local highway and traffic conditions including demand for on-street parking. These standards will be expected to be met, unless it can be shown that in proposing levels of parking applicants can demonstrate that there would be no adverse impact on the area in terms of street scene or on-street parking".

Accessibility/Parking Assessment

- 6.97 The site has a mixed PTAL of 2 towards the town centre and a PTAL of 1 closer to the River Thames, being about 1.5km from Teddington Station.
- 6.98 The scheme provides for 258 car parking spaces, of which the majority are located within the basement car park, with the residual number at surface level. The houses to the Broom Road frontage have their own dedicated parking to the rear. The proposal therefore fully complies with the Councils standards.
- 6.99 The proposal also provides disabled parking and all electrical charging points in accordance with London Plan standards.

6.100 The application proposal is supported by a Transport Assessment that forms an Appendix to the Transportation Chapter of the ES. In addition a draft Framework travel plan is submitted with the application. This concludes that It is concluded that the proposed redevelopment of Teddington Studios to provide 219 'Use Class C3' dwellings will deliver long-term benefits in highways terms by reducing the number of vehicle trips generated by the site, particularly large vehicle trips. In this respect there will be no adverse impact on the local highway network.

Cycle Parking

- 6.101 The London Plan Policy 6.9 says there is a requirement for all developments to provide "secure, integrated and accessible cycle parking facilities" in order to encourage cycling and deter car usage. Dwellings should provide, as a minimum, 1 cycle space per 1-2 bed units and 2 cycle spaces per 3 or more bed units. The Revised Early Minor Alterations to the Plan also seek visitor provision at a ratio of 1:40.
- 6.102 As indicated above Policy DM TP 8 refers to the cycle standards in Appendix Four. These seek a minimum of 1 space for 1-3 bedroom dwellings and 2 spaces for larger units.

Cycle Parking Assessment

6.103 Provision is made for secure cycle spaces within the scheme. The level of provision proposed is in accordance with the latest London Plan standards and those of the Council.

Flood Risk

6.104 The site is in an identified Flood Zone 3 area. As such, the application is supported by a Flood Risk Assessment. This illustrates any impacts the scheme could have on surface water and ground water movements along with those mitigation methods that would be employed in order to reduce any future incidence of flooding.

6.105 Development Management Policy SD6 deals with 'Flood Risk'. It states:

"Development will be guided to areas of lower risk by applying the Sequential Test as set out in paragraph 3.1.35. Unacceptable developments and land uses will be restricted in line with PPS25 and as outlined below. Developments and Flood Risk Assessments must consider all sources of flooding and the likely impacts of climate change.

Where a Flood Risk Assessment is required and in addition to the Environment Agency's normal floodplain compensation requirement, attenuation areas to alleviate fluvial and/or surface water flooding must be considered where there is an opportunity. The onus is on the applicant/developer for proposals on sites of 10 dwellings or 1000sqm of non-residential development or more to provide evidence and justification if attenuation areas cannot be used.

In areas at risk of flooding, all proposals on sites of 10 dwellings or 1000sqm of non-residential development or more are required to submit a Flood Warning and Evacuation Plan".

6.106 Policy DM SD 8 deals with Flood Defences. It states:

"The effectiveness, stability and integrity of the flood defences, river banks and other formal and informal flood defence infrastructure within the borough will be retained and provision for maintenance and upgrading will be ensured. Setting back developments from river banks and existing flood defence infrastructure, where there are opportunities, will be encouraged. The removal of formal or informal flood defences is only acceptable if this is part of an agreed flood risk management strategy by the Environment Agency.

The Environment Agency must be consulted for any development that could affect a flood defence infrastructure".

Flood Risk Assessment

- 6.107 The proposal is supported by a Flood Risk Assessment, together with the Exception Test and Sequential Assessment. The scheme has been developed having regard to the most recent flood levels from the Environment Agency and in consultation with both the Environment Agency and the Council.
- 6.108 These matters are addressed in more detail in the above documents but they key result of the assessment is that the development can be undertaken without risk of flooding.

Biodiversity and Landscaping

6.109 Policy DM OS 5 deals with Biodiversity and new development. It states:

> "All new development will be expected to preserve and where possible enhance existing habitats including river corridors and biodiversity features, including trees.

> All developments will be required to enhance existing and incorporate new biodiversity features and habitats into the design of buildings themselves as well as in appropriate design and landscaping schemes of new developments with the aim to attract wildlife and promote biodiversity, where possible.

> When designing new habitats and biodiversity features, consideration should be given to the use of native species as well as the adaptability to the likely effects of climate change.

> New habitats and biodiversity features should make a positive contribution to and should be integrated and linked to the wider green and blue infrastructure network, including de-culverting rivers, where possible.

6.110 Policy DM DC 4 deals with Trees and Landscape. It states:

"The boroughs trees and landscape will be protected and enhanced by:

- The use of Tree Preservation Orders (TPOs) where appropriate;
- Planting and encouraging others to plant trees, clumps and thickets particularly in areas of deficiency as shown on the Proposals Map and of a type and species as set out in the Borough's Tree Strategy.
- continuing to maintain trees in streets and public open spaces and of selectively clearing and replanting trees;
- requiring landscape proposals in submissions for new development, which retain existing trees and other important landscape features where practicable and include new trees and other planting. Where trees are removed, appropriate replacement planting will normally be required. There will be a presumption against schemes that result in a significant loss of trees, unless replacements are proposed and there is good reason such as the health of the trees, public amenity, street scene or restoration of an historic garden. Landscaping schemes should take account of the Borough's Tree Strategy".

6.111 DM OS11 deals with the Thames Policy Area. It states:

"The special character of the Thames Policy Area (TPA), as identified on the Proposals Map, will be protected and enhanced by:

- 1. ensuring development protects the individuality and character, including the views and vistas, of the river and the identified individual reaches;
- 2. discouraging land infill and development which encroaches into the river and its foreshore other than in exceptional circumstances, which may include where necessary for the construction of river dependent structures such as bridges, tunnels, jetties, piers, slipways etc.;
- 3. ensuring development establishes a relationship with the river and takes full advantage of its location, addressing the river as a frontage, opening up views and access to it and taking account of the changed perspective with tides;
- 4. encouraging development which includes a mixture of uses, including uses which enable the public to enjoy the riverside, especially at ground level in buildings fronting the river;

- 5. protecting and promoting the history and heritage of the river, including landscape features, historic buildings, important structures and archaeological resources associated with the river and ensuring new development incorporates existing features;
- 6. protecting and improving existing access points to the River Thames, its foreshore and Thames Path, including paths, cycle routes, facilities for launching boats, slipways, stairs etc. and encouraging opening up existing access points to the public, both for pedestrians and boats;
- 7. requiring public access as part of new developments alongside and to the River Thames, including for pedestrians, boats and cyclists, where appropriate;
- 8. increasing access to and awareness of the river including from the town centres".

Biodiversity and Landscaping Assessment

- 6.112 The existing application site whilst adjoining the River Thames lacks in biodiversity and quality landscaping. The proposal provides for an extensive landscaped area fronting the river with high quality landscaping.
- 6.113 The development of the site will provide access to a riverside walk for the first time. The site is the subject of a landscaping masterplan that will provide for high quality landscaping throughout the whole development.
- 6.114 The proposed development will see a significant increase in the amount of green, open space and the choice of plant species will provide an attractive setting to the development and residents and visitors will be able to enjoy the seasonal changes associated with specific trees and plants. An emphasis on the use of native species and those that attract wildlife will help to enhance the nature conservation value of the development and respond to the wildlife such as bats and birds found along the river corridor.

Planning Obligations

The Application will provide for Planning Obligations in accordance with the 6.115 Councils policy and adopted Planning Obligations Strategy. Provision will be made for contributions towards transport, public realm, health and education in accordance with the draft Heads of Terms.

7.0 **SUMMARY AND CONCLUSION**

- 7.1 The proposal is for the redevelopment of this current employment site on the relocation of the existing occupiers to an alternative location. The proposal will provide for 219 residential units, mainly dwellings with car parking.
- 7.2 The development will comprise four buildings arranged parallel to each other between Broom Road and the River Thames. To the Broom Road frontage itself will be a smaller residential building to one side of the access and six houses on the other side of the access. Weir Cottage will be retained and refurbished for residential purposes.
- 7.3 Two new access points will be formed from Broom Road that will serve development and provide access/egress from the parking areas; the main parking area is at basement level. Cycle parking is also provided as part of the development
- 7.4 The proposal has been the subject of extensive discussions with the Council, pre-application discussion with the GLA and has been the subject of two rounds of community engagement.
- 7.5 Of public benefit is the provision of access to the River Thames for the first time. This will be provided through the application site to the new riverside walkway.
- 7.6 The proposal has been carefully considered and developed by the development team and in addition to the Environmental Statement (ES) is supported by a number of specialist reports. The proposal therefore complies with relevant development plan policies and guidance so that it delivers a major residential scheme that will assist the Council in meeting its current and future housing targets. It will be a positive asset to the area.
- 7.7 The Council has recognised the sites potential through its designation for residential purposes in the draft Site Allocations DPD. It is considered that the development proposal can be supported.