

## ES Addendum Consultation Responses

### BRE - Sunlight and Daylight

1. Table below extracted from BRE response.

Table 1 ADF values below recommendation for living rooms

Room reference	ADF	Location
R20/10	1.44	A/ground
R21/10	1.00	A/ground
R19/21	1.07	B/1
R9/41	1.35	C/1
R17/41	1.12	C/1
R17/42	1.20	C/2
R12/30	1.47	D/ground

2. ***R12/30 is only marginally outside the recommendation, and would have shown as a pass if the values were expressed to one decimal place. The daylight to this room would be reasonable. R20/10 is also close. The other five rooms have lower values.***
3. ***In most cases, the windows serving these rooms are heavily obstructed, having Vertical Sky Components (VSCs) of between 5.12% and 10.78%. There are two windows which receive more daylight (16.21% for one of the windows serving R9/41 and 21.50% for one of the windows serving R19/21), but generally the values are low. Therefore windows need to be very large in order to bring enough daylight into the room, particularly if the room itself is large.***
4. ***In some of these cases, subject to engineering and aesthetic concerns, there may be scope to increase the window sizes. However, others already receive the maximum amount of daylight they are likely to receive. Windows to R17/41 and R17/42 suffer from being set in the corner of a building and also having a balcony above them. Increasing the size of the window into the corner would increase the ADF slightly but it would still be unlikely to reach the recommended level. The window to R20/10 already occupies most of the façade, but the ADF for this room is only slightly outside the value recommended for living rooms.***
5. The size of the rooms and the windows to these rooms have been addressed and revised so that they comply. This is supported by the attached letter from Savills (Appendix A).

6. ***Given that all of the living rooms with a window facing south east or south west achieved the guidelines before the balconies were included in the calculations, this does mean that the balconies are the critical factor in sunlight received by relevant windows, and the current design does not achieve the guidelines with the balconies present. As stated in the report, the balconies themselves will receive adequate sunlight. A view will need to be taken as to whether the amenity provided by the balconies and the other merits of the scheme outweigh the lack of sunlight provision to the rooms.***
  
7. Given the orientation of the site and the view of sunlit space enjoyed by many of the residents and that the balconies are a required amenity provision it is considered that an appropriate balance has been met.

BRE – Micro Climate / Wind

#### ***Desk Top Study***

8. ***The works 'this is considered' implies the RWDI have taken a professional view about the appropriateness of undertaking a desk-study in these circumstances. The judgement should be stated clearly in the ES.***
  
9. It is the professional opinion of RWDI, based upon experience, that a wind tunnel test on a scheme the scale of Teddington Riverside would be a highly unusual scenario and that in this context, the desk-based assessment is an appropriate and proportionate assessment of the scheme. To our knowledge we have never conducted a wind tunnel test of pedestrian comfort on a development where the tallest buildings are ca. 7-storeys (other than for the baseline assessment of existing buildings as part of a series of wind tunnel tests for a much larger proposed development where the reason for the test was the tall proposed new building).

### ***Localised Accelerated Areas***

10. ***Following the explanation of how the channelling effect has been used to explain figure 12.2 assessment of wind conditions, it is agreed that this effect is likely to occur thus creating the windier corner conditions that are shown.***
11. No response required
12. ***However, you are likely to also see small regions of windy areas at the windward corners. These localised windy areas (which either have not been identified or are not considered to be significant) are caused by small vortices generated by the windward corners.***
13. We have previously provided clarification regarding the wind environment in the vicinity of the corners of the buildings and entrances near these corners. We do not consider that the windward vortices referred to by BRE would be as significant as the winds that occur near the downwind corners of the building. The downwind corners are subject to a collective effect due to wind being directed along and down the façade towards the corner and in our experience, and for the Teddington Riverside scheme; these would be more significant in terms of the overall wind environment.

### ***Clarification on Accelerated Flow to the South-East of Block E***

14. ***Comments have been provided to the South-East of Block B, therefore the review comments have not been addressed.***
15. We think that the confusion over Block B and Block E is a typo in the RWDI response, the description previously supplied applies to Block E and the channelling of wind along the SE elevation of Block E.

### ***Set Back of the Entrances***

16. ***Following the clarification of the term 'set back' the issues relating to the likelihood of there being windy windward corners (as discussed above) remain to be addressed.***

17. It appears that the term 'set-back' has caused confusion but we have attempted to explain what was meant in our previous dialogue. Notwithstanding the RWDI explanation and the physical 'separation' between the indicated windy zone and the entrance, the BRE maintains the position that the entrance would be too windy. It is our view that the entrance would not be within the windy area.
18. ***Low-rise and medium schemes can have unpleasant winds if they are located in exposed area.***
19. Buildings with heights much less than 15-storeys are regularly assessed when they form part of (say) a large masterplan (where the reason for the wind tunnel test would be primarily driven by tall buildings in one part of the masterplan) or as part of an EIA assessment where we would routinely conduct a baseline test of the existing buildings (the reason for the wind tunnel test would be the proposed tall building, but the baseline might well comprise a series of low-rise residential or commercial units and those would also be tested).

#### Air Quality

20. ***7.1.33 Table 5 relates to two 50% reductions. One relates to the dispersion of pollutants with distance. Does this only relate to dispersion in undisturbed air rather than downwind of an extract fan plume?***
21. Firstly the maximum annual mean nitrogen dioxide concentration would only be 35 mg/m<sup>3</sup>, even if the two 50% reductions did not apply (this is the background of 29 mg/m<sup>3</sup> combined with the nitrogen oxides concentration in the emissions of 6 mg/m<sup>3</sup> – these values can be derived from Table 5.). Secondly, there will not be a concentrated plume of exhausted air. The air will be being discharged from long grilles set in the walls of the down and up ramps to the car park. The grilles will be some 9-10 metres in length and the air will be discharged horizontally, blowing away from the residential units. There will therefore not be a plume of ventilation air being blown towards any of the residential units. The conclusion that "The emissions from the car park will therefore not give rise to any significant air quality concerns for nearby residents" therefore still stands.

22. ***If so, without dispersion, could there be an exceedance of NO2? Likewise, could there be an odour issue with a directional plume?***

23. This issue has been addressed above, where it is made clear that there will not be a plume blowing towards the residential units.

#### Urban Design

24. ***The wireline illustrates are useful, but Key View M appears incorrect and it is expected that there would be outline of taller building from there notwithstanding the distance from the site. The methodology of producing this wireline may clarify the issue.***

25. Additional information has been added to the wirelines that show the closest building and then the other proposed buildings on the site that are either obscured by the closest building or other existing buildings in the area. These demonstrate that the wirelines are correct.

26. The 3D model of the application proposal has been aligned with the views selected in the visual impact assessment and then placed into those photographs.

27. ***The extra height of the riverside is quite well shown on Key View F. There is still a concern over the height above what is desirable.***

28. The proposed buildings are lower than the tallest part of the existing buildings on the application site and therefore accord with the development brief for the site.

#### **Housing (JC):**

#### Schedule of Accommodation

29. ***The Addendum clarifies the unit sizes, identification of shared ownership units and location of wheelchair units, with a more detailed schedule at Appendix B.***

30. No response required.

31. ***The Addendum states that to provide 10% wheelchair units, thereby equating to 20 units throughout the scheme. These are 2 x 1 bed, 14 x 2 bed, and 4 x 3 bed. One of the 2 bed wheelchair units is affordable, the***

**rest are private units. The units appear relatively spacious (as are all units) and with some aspects of layout that may be suitable for wheelchair users e.g. a good sized entrance hall.**

32. A plan showing a typical layout of a wheelchair unit is attached as drawing CO600 P1.

33. ***I am concerned that the schedule describes these units as "potential" wheelchair user unit. There are no turning circles or transfer zones shown in any of the bathrooms. To comply with Policy CP14, an application should clarify how identified units comply with relevant standards, for the wheelchair units this should be Wheelchair Housing Design (Habinteg, Thorpe S., 2006) or the Design for Maximum Access SPG.***

34. The units will be provided as capable of being used as wheelchair units with the addition as required of handrails, etc. They are not provided as fully equipped units. Turning circles and transfer zones are shown on the attached plan.

#### Housing Supply

35. ***The Addendum now accurately recognises that the proposal equates to a significant addition to the Borough's present and future housing supply.***

36. No response required.

#### Affordable Housing and Viability

37. ***I note paragraph 2.1.19 in the Addendum refers to the Affordable Housing SPD. Paragraphs 3.1.59 to 3.1.74 in the Addendum provide further details on affordable housing context and the offer of shared ownership units.***

38. ***Amongst other things, it states "The justification for no provision of on site social rented accommodation is that it is not viable to do so as set out in the submitted viability assessment." and "Savills are preparing a separate report, in the context of on going affordable discussions, to consider the potential routes of procuring affordable housing off-site, and the number of units that may be delivered with a fixed sum, and will provide this to the borough in due course."***

39. ***The recognition of the need for affordable housing is welcomed, however the references are to viability which is still an outstanding issue and sufficient evidence, including the separate justification document referred to, has not been provided to the Council. As it stands this does not address policy requirements.***
40. The provision and delivery of affordable housing in connection with the application proposal is still the subject of on-going discussions between the applicant, the Council and Registered Providers. These will demonstrate that through the provision of an off site contribution to delivery elsewhere in the Borough a higher level of affordable housing can be secured.
41. The culmination of this work has been presented to the Council under separate cover.

**Public walkway / riverside walk – not fully policy compliant (AK):**

42. ***The applicant has now provided a plan (Appendix 3, Spatial Diagram), which shows the areas of public access in terms of the hardsurfaced walkways from Broom Road through the site and along the river frontage.***
43. ***However, in relation to the draft Heads of Terms for the "Riverside Pedestrian Walkway", I do not agree with clause 5.3, including 5.3.1 and 5.3.2 as closing off the access through the site to the riverside in the future could lead to a gated development, which is contrary to DM TP 3. Therefore, even if the Council can secure connections to the adjacent sites along the river frontage (i.e. to the Anglers Pub and Lensbury Club), the public walkway through the application site should be retained in perpetuity. This is regardless of any other off-site paths that may be secured in the future.***
44. ***The area shown as "public access to/on Riverside" should be designated as "Public Open Space", and this should be secured via a Section 106 agreement. As and when the Council produces its next Development Plan Document, this area can then be formally designated.***
45. ***Note that this is in line with approaches taken on other redevelopment sites in the borough, such as on the land at former Brunel University, St Margarets (Octagon Developments).***

46. ***Recommendation: Remove clause 5.3 of the draft Heads of Terms and include the area shown as "public access to/on Riverside" within the draft Heads of Terms to be designated as "Public Open Space".***

47. The comment on the draft Heads of Terms is noted regarding the removal of the clause and the applicant will propose revised wording in the draft HOT. The areas of land identified (areas (1-9) on the Spatial Diagram) are open space with area 10 as public access to/on the Riverside. It is not proposed that these be 'public' open space, rather open space accessible by the public.

**Public open space – not policy compliant (AK):**

48. ***The new plan in Appendix 3, Spatial Diagram, does not identify any public open space on this site; whilst it now clearly shows the "public access to/on Riverside", it is unclear whether the public will also be allowed to use the open space alongside the riverside walkway up to the new residential blocks. The drawing is therefore insufficient at this stage because it leaves uncertainties for some areas of the site, which should be clearly identified.***

49. ***Whilst the applicant has reappraised the location of the public open spaces and play spaces within the vicinity and wider area of the site, it is not considered that the scheme complies with DM OS 6. This policy clearly requires public open space provision within larger new developments. It is acknowledged that the scheme has to strike a balance between private, semi-private and public open space provision; however, the proposal as submitted, with the exception of the access to/on riverside, provides for no on-site public open space.***

50. The author has not fully understood the drawing. As noted above the land parcels identified (areas (1-10) on the Spatial Diagram) are open space accessible by the public. This includes the riverside walkway.

51. The Spatial Diagram has been further annotated and is attached as Appendix B).

**Play space – not policy compliant (AK):**

52. ***The applicant carried out a child yield assessment, which demonstrates that the development will generate approximately 139 children (using the***



***S106 calculator – note that I have not double-checked this figure), whereby the split is as follows: 49 children between 0-4 years; 53 children between 5-10 years, and 37 children between 11-15 years.***

53. ***The assessment now clearly shows that there are no dedicated play facilities within 100m walking distance for the under 5 year olds, and no facilities within 400m walking distance for the 5-11 year olds as required by policy DM OS 7. As there is no opportunity for those groups to access existing provision, the benchmark standard of 10sqm per child needs to be applied. As such, there is a need for dedicated on-site play space of 1,020sqm (that is based on 49 + 53 children). I acknowledge that the requirement for provision of play space for children under 5 may be discounted in relation to those houses with gardens in assessing play requirements; however, to date, the applicant has not carried out this detailed assessment.***
54. ***The Environmental Statement (para 3.1.49) confirms that there will be no specific provision for play space in the proposed development, and para 3.1.50 clearly identifies a negative impact in terms of play space provision. The proposal is therefore not policy compliant and the applicant has not addressed the negative impacts as identified in the Environmental Statement. Policy DM OS 7 clearly requires on developments with ten children or more appropriate on-site play provision; in this instance, it is not appropriate to seek an equivalent financial contribution to address this negative impact as the Council has no plans of creating a play space within the vicinity of the site.***
55. The author has not fully understood the drawings or the additional text. The scheme has always included for playspace or playable areas within the development based upon the GLA standards. Areas of playable space, with playable features, were identified on the landscape layout drawing at Appendix 5 of the Addendum Document.
56. Further the comment in relation to para 3.1.49 in the Addendum was solely in relation to the fact that no specific equipment is provided for 5-11 year olds within the scheme; not that there was no playspace. More than adequate space is provided for 0-11 year olds within the scheme as indicated previously.

57. A dedicated plan showing the playable areas and equipment is enclosed as Appendix C.

**Riverside uses – not fully policy compliant (AK):**

58. ***The applicant provided further information within the Addendum to the Environmental Statement in relation to the river-dependent or river-related uses as required by policy DM OS 12.***
59. ***It is acknowledged that the existing site has never contained any river-dependent or river-related uses and that the scheme is in line with the emerging Site Allocations Plan, which does not specifically seek any river-related uses on this site.***
60. ***Policy DM OS 12 sets out that a river-related use may include a garden or park designed to enhance public appreciation of the river and its ecology. The proposed riverside walkway only addresses to some extent policy DM OS 12.***
61. The proposed riverside walkway, open space and ecological provision through the landscaping are considered to meet the requirement of this policy. There are existing premises in the immediate area that provide opportunities for eating and drinking. It is not an aspiration of the Local Plan site allocations document for other uses here.

**Recommendation – public open space, play space and riverside uses (AK):**

62. ***To achieve policy compliance with DM OS 6 (public open space), DM OS 7 (play space) and DM OS 12 (riverside uses), the applicant should include a designated public open space in the form of a public riverside garden or riverside park, and which would draw and encourage members of the public to the riverside area via the public walkway. The new riverside garden/park should also include a designated play area with facilities for the under 11s to address the identified negative impact.***
63. Provision is made for open space and playspace within the development.

**Flood Risk – additional information already requested (AK):**

64. ***Council officers met with the Environment Agency and the agents including their flood risk consultant on Wednesday 2 July 2014 to discuss the flood risk issues.***
65. ***It was agreed that the applicant needs to provide further details, and that at this stage the Addendum to the Environmental Statement is inadequate as it has not fully addressed the concerns previously raised by the Council.***
66. Further submissions have been made to both the Council and the EA on this matter and it is considered that all outstanding matters have been addressed. Some feedback is awaited from the Council on the four emergency planning points is awaited.

**Green roofs – acceptable (AK):**

67. ***The previous proposal only included a combined green roof area of 150sqm. I note that the applicant has made an effort to incorporate further green roofs in line with policy DM SD 5, and to combine green roofs and PV panels. The extent of the proposed green roofs has been significantly increased as part of revisions to the application proposal as shown within Appendix 6 of the Addendum.***
68. ***In line with Appendix 6 (Proposed Roof Plan), the total green roof area is 1,567sqm, whereby the area with PV panels on a green roof base are 714sqm, and the remaining green roof area is 853sqm.***
69. ***I consider this part of the application now acceptable as the applicant has successfully demonstrated compliance with policy DM SD 5.***
70. ***The Council's sustainability consultant should advise in relation to the additional elements as set out in section 12 of the Environmental Statement – Addendum.***
71. The Councils Sustainability Consultant confirmed that their comments had been answered and had no further comments needed to be made.

**Retail (FOT):**

72. ***My earlier comments related to the fact that there is no retail existing or proposed and that I considered that retail need not be provided on site to meet the needs of the housing development due to the proximity of the district centre.***

73. ***The impact of the loss of employees on retail in Teddington has been raised by others. This was in part dealt with in the ES. The ES contends that there will be some moderate beneficial increase in spend from the proposal. My view would be that the impact is more neutral.***

***Total employees:***

74. ***Haymarket - 1,200, Studios - ?"very few". An estimate would be 1,220 employees. Multiplied by a spend of £5 a day. (Estimating 220 days at work per year). The total for spend from existing employment could be £1,342,000 per year.***

75. ***There are estimated to be 390 residents. If we use the figures from the soon to be published Retail Study we would get a figure of £1,062,810. This is derived from working out the expenditure per head for both comparison and convenience shopping for those in the most relevant survey zone (Teddington) and deducting the expenditure which is spent outside the borough. These figures are combined and multiplied by the number of expected residents.***

76. ***I should stress that these figures are very rough estimates. I have been advised by our consultants on producing them. The calculations do of course take into account the temporary increase in staff at the Haymarket site. Had the lower employment figure been used it would have produced a lower result. Bearing in mind the rough and ready nature of the calculations I would suggest that the overall impact is probably not hugely significant. I doubt that there is merit in pursuing them to go to the lengths of undertaking staff expenditure surveys to provide a more accurate figure.***

77. No response required

## **Employment**

78. ***The application was in accordance with the emerging Site Allocations Plan, however, not providing the replacement employment land (RuT Site) means that the policy context for the loss of employment land at the Studios site is undermined (see for example statement at 3.1.2);***
79. Haymarket have occupied the riverside office element of the old Teddington Studio Site since 2005. They relocated from four separate offices within the borough, into that building following an extensive £12m investment into the refurbishment of those buildings. The buildings have continued to house just under half of Haymarket's employees, some 550 staff, until December 2013 when the remaining 650 staff temporarily migrated across to this location. They currently occupy some 7850m<sup>2</sup> of functional, but tired office space.
80. The move of the 650 staff from the Hammersmith buildings was a short term interim solution born out of necessity. Originally, Howard Holdings, the previous owners of the site, sought permission for circa 9293m<sup>2</sup> of offices. At that time this was in context of a planning brief for this site which advocated a mixed use development with some commercial and some residential. It was clear from this brief that a large scale office development will not be acceptable in what is a predominantly residential location, with insufficient transport infrastructure and access.
81. Haymarket have been in discussion with the Council for some four years regarding a new, more appropriate home for their thriving publishing business. These discussions intensified early in 2013 with a view to finding a site and or buildings that were capable of housing Haymarket's current staff and secure their long term future within the borough. It immediately became apparent that there was a dearth of office buildings within the vicinity or indeed wider filled within the borough.
82. This was attributed the fact that there are not many large organisations within the borough and therefore demand for sizeable buildings has and continues to be relatively scarce. In this context, apart from the local authority, Haymarket as a newly merged business are the largest employer within the borough. It was quickly identified whilst on a like for like basis 7850m<sup>2</sup> was required it was looking ideally for circa 9293m<sup>2</sup> and this was unlikely to be achieved in one

building and furthermore, building a campus of 2 and 3 buildings, still of a significant size, would be difficult to justify.

83. Following discussions and extensive site and building identification studies the potential for a new commercial office campus was identified at the RUTC site alongside the A316. This was originally Haymarket's preferred location but even with two separate smaller buildings of 4182m<sup>2</sup> and 5111m<sup>2</sup> respectively, with a reasonable site acquisition value, this was still marginally unviable. As part of Haymarket's commitment to the borough and to the Richmond Education and Enterprise Campus (REEC) on the RuTC site this potential was pursued but it has now become apparent that the rising costs of available land and the requirements for this site for the replacement college, new secondary and Clarendon special school means that this is not now feasible.
84. The existing Haymarket buildings within the Teddington site are not only outdated but also tired and are in need of significant investment. This investment is not justified in this location, especially as the existing piecemeal collection of buildings provide inadequate floor to ceiling heights and inadequate services solutions for an e-publishing business. It should be noted that this transition from a print based organisation has only taken place over the last five or so years.
85. In addition to this, the Pinewood Studios Buildings have lacked investment for some 10-15 years and these are simply not viable to be refurbished nor is there any need for this type of accommodation given Pinewood's declared intent and the recent appeal decision by the Secretary of State, which confirms Pinewood's long term ambition for their centre of British filmmaking in Iver Buckinghamshire.
86. The applicant still intends to remain in the Borough. Prior to the consolidation of their staff at Teddington the facility employed 550 staff. The additional staff were always moved to Teddington on the basis that this would be a temporary move and the floorspace does not provide suitable long term facilities for 1200 staff.
87. The solution will still see the company located within the Borough and occupying floorspace that may not be occupied because of the need for investment and the potential for conversion to residential under PDR, thereby protecting existing office floorspace in the Borough for continued employment use. The company is in active discussion with a number of landlords in both Twickenham and Richmond to provide office space for all 1220 of its staff over total office space requirement of up to 7434m<sup>2</sup>. This together with the company agreeing to provide a tech hub of

up to 1858sqm on the RuTC site as part of the company's long term commitment to the REEC represents a total office requirement of 9293m<sup>2</sup>, an uplift of some 1394m<sup>2</sup> on the current Teddington office space used by the company. This is a significant benefit to the Borough for its long term employment base and in terms of the type of employer and quality of jobs that will be secured.

88. The ES Addendum explained why the present buildings are unsuitable for continued long term use and retention for employment purposes. The applicants advisors, even without specific marketing, are confident that no long term solution would be identified that would mean that the location and the whole of the present site would be of interest to an office occupier.
89. In addition to retaining employment levels in the Borough from the original staff numbers, remaining in the Borough also retains the uplift in employment of some 650 staff that has taken place at the end of last year
90. As referred to above there is the proposal for the Tech Hub of up to 1858m<sup>2</sup> at the RuTC site and discussed below.
91. ***Although a case is made that the buildings are unsuitable for modern needs, poorly located in relation to public transport accessibility and lack of local demand there is no marketing evidence or consideration of a mixed use scheme –as envisaged by the Planning Brief which promoted small employment units;***
92. This is correct. However the Planning Brief is now dated and the condition of buildings on site and the economy has changed significantly since the Brief was produced.
93. In the context of the draft Site Allocations document the Council accepted the loss of the existing floorspace but this was subject to re-provision of offices elsewhere in the Borough. In these circumstances it was accepted that the provision of employment floorspace on the Studios site as required by Employment Policy and the Planning Brief was not essential.
94. Against this aspect must be balanced the opportunity to bring forward a significant addition to the Councils housing land supply. This will assist the Council in applying its employment policies to retain other employment sites that are under pressure from change of use.

95. ***In view of these concerns the employment justification needs to be strengthened in particular.***

***(a) in relation to retention of offices which could have been subject to prior approval process and lost to residential;***

96. The company is committed to remaining in the Borough, and indeed is willing to pay a significant “move penalty” if it is still not in the borough five years from the date of planning grant and occupied alternative space to enable the early release of the application site for much needed housing. It is anticipated that these agreements will be completed once planning permission is granted.

97. Two of the three buildings that are being progressed have been the subject of applications for prior approval for change of use from offices to residential. One was refused by the Council but granted on appeal and the other granted by the Council. In total if the permitted development rights were implemented these would result in the loss of around 4740m<sup>2</sup> of existing office space.

98. Occupation by Haymarket rather than the loss of the office floorspace will retain the floorspace in office use for the Borough.

99. A third building (around 2510m<sup>2</sup>) will also be occupied within the Borough to enable sufficient space to be provided enabling the retention of all of Haymarket’s employees. This will provide for the residual floorspace that when the Tech-Hub (1859m<sup>2</sup>) is also taken into account demonstrates that there will actually be a net gain of employment floorspace. (9110m<sup>2</sup>). This compares with the existing floorspace referred to at paragraph 77 above of 7850m<sup>2</sup>.

Multiple Buildings in Borough	7,251m <sup>2</sup>
Tech Hub	1,859m <sup>2</sup>
Total	9,110m <sup>2</sup>
Teddington Existing	7,850m <sup>2</sup>
Net Gain	1,260m <sup>2</sup>



100. The tech-hub land acquisition, construction and fit out with CAT A – CAT B is likely to be in the region of £4-5m.
101. Given this existing floorspace also comes at a cost to fit out and make ready for occupation for Haymarket's specialist use, then they are likely to have to expend some £3m on making the space suitable for them.
102. As indicated above the applicant is willing to accept a significant 'move penalty', given that they are committed to remain in the Borough. This is based upon a clause on the draft HoT's that will mean that if they are not occupying office space in the Borough at the fifth anniversary of the issue of planning permission then they will be liable for a single payment to the Council of £5m.

***(b) the local economic benefits of the proposed a new "tech hub" that will comprise digital labs, state-of-the-art photographic studios, photographic archives, listening rooms and gallery;***

103. Haymarket "tech hub" is an innovative workspace that aims to further collaboration across education and enterprise in the media sector. Around 20 of Haymarket's creative and digital experts will be based full-time at space which will also see the media company share its expertise with campus students through careers forums, lectures and mentoring. The hub will also include a new media incubator that will provide equity investment and seed funding from Haymarket to bright young media entrepreneurs and start-up, together with access to state-of-the-art facilities and mentoring from the company's experts. This will help to develop new local employers, jobs and growth.
104. Campus students will benefit from the state-of-the-art facilities including digital labs, studios, video editing suite and gallery space.
105. The hub will see Haymarket benefit from a deeper talent pool of education and entrepreneurial young people and insight from the next generation of Haymarket audiences and clients.
106. Haymarket will buy the required land for the tech hub from RuTC and will fund the build out the CAT A and CAT B costs. Haymarket will operate the tech hub

and will provide free of charge access to students from RuTC and the Free School throughout the college terms i.e. for 40 weeks a year.

### **Digital labs**

107. Haymarket's digital labs will specialise in engaging audiences by designing and building across desktop, tablet and smartphones. A number of Haymarket's digital experts will be based full-time at the digital labs. In addition, through the Skills Academy, Haymarket's digital labs will provide young people with the opportunity to get hands-on experience while developing the skills' required to launch their careers in today's media world.

### **Studios**

108. Haymarket's state-of-the art-studios will cater for all forms of set-up photography from multiple car shoots to portraiture. The main studio will include an infinity area, articulated lorry entrance, 2-ton car turntable, scissor lift for height shots and tungsten lighting. The main studio will be 285 square metres with double height, with two additional studios at 100 square metres and 16 square metres. The studios also include two video studios at 50 square metres and 38 square metres.

### **Digital media suite**

109. Haymarket's digital media suite is a facility for video and audio editing work and includes sound-proof editing booths for post-production finalisation and playback work.

### **Consumer electronics listening rooms**

110. The consumer electronics listening rooms comprise dedicated AV, UG, Hi-fi, TV and MP3 rooms where Haymarket's market-leading consumer electronics brands test the very latest products before they go to market. The rooms cover a total of 170 square metres. The AV room is used to test home cinema equipment such as AV amplifiers, Blu-ray players, speaker packages and projectors. The AV, UG and Hi-fi rooms are acoustically treated to deliver the most neutral sound. Haymarket's TV room is decorated in neutral colours so as not to impact picture performance and allows the brands to compare two TVs directly using multiple

sources. The final MP3 Room is a small room dedicated to desktop audio, sound bars and smaller wireless speakers.

### **Photographic agency and archive**

111. With the latest technology in digital imaging and editing, LAT photographic agency and archive covers all photographic needs for media and marketing. LAT works with more than 20 award-winning photographers worldwide to guarantee the best coverage of global motorsport action, lifestyle and reportage. The archive houses a visual history of photography from the last 115 years with over 12 million colour images and back and white negatives dating back to 1895. The archive will occupy a footprint of 150 square metres. Other services offered by LAT include top quality traditional black and white hand print production and a full digital service, including image retouching, high resolution scanning and large format printing.

### **Gallery space**

112. The gallery is a public exhibition space where creative and digital teams can showcase their best design and photographic work.

### **Media incubator**

113. The media incubator will see the brightest young media entrepreneurs and tech start-ups benefit from seed funding and equity investment from Haymarket.
114. Overall the facility will provide for innovation and skills that will enable users to benefit in their employment searches.

### ***(c) the level of employment at the facility;***

115. It is anticipated that this facility will provide full time employment for 20 people.

### ***(d) the apprentices scheme to be developed by the College.***

116. It is anticipated that this facility will provide for seven apprenticeships.
117. ***The building and fitting out of the 'tech hub' by Haymarket and the commitment to apprenticeships should be built into the Sect 106.***

118. Agreed with a Cascade arrangement in place that will underpin the value of the Tech Hub and will become payable by the company to the borough in the scenario when the Tech Hub has not been built on the RuTc site within a timeframe to be agreed

### **Summary**

119. The original Environmental Statement submitted with the Planning Application considered the effects under the following headings. We have considered whether any of the subsequent work in the Addendum or the Addendum response document affects the views given

#### *Socio Economic*

120. The proposal will represent a change in how the site is occupied and used with a transformation from an employment base to a residential one. There will be socio economic impacts arising from this through construction jobs created, indirect jobs created in other sectors to meet the needs of the new residential population, changes in demand on services such as health and education.
121. The proposed riverside walkway, space accessible to the public within the scheme will provide features not currently available to local residents so is of benefit. Provision will be made on site for playable space and equipment to meet the needs to younger children within the scheme.
122. Other impacts off site can all be addressed through levels of financial mitigation through the S106 process and agreed Heads of Terms.

#### *Ground Contamination*

123. We have considered the geology and ground conditions of the site. The initial work undertaken has not identified any significant risk from developing the site for residential purposes. Further investigations are however required to ensure any localised contamination is adequately addressed. These can be conditioned as part of the grant of planning permission.
124. No change

### *Services*

125. We have considered the effect on existing services. New supplies will need to be brought into the site and new substations will be required for electricity with a new gas intake room associated with the CHP energy centre. All services within the development will be sized to accommodate the development components.
126. No change

### *Flood Risk*

127. We have considered the potential impact of development for a flood sensitive use in a location adjoining the River Thames. To mitigate the potential effects various measures are proposed to safeguard the site and the future occupiers. These range from physical measures through to electronic warning systems to safeguard further residents.
128. Further submissions have been made to both the Council and the Environment Agency on the FRA that demonstrate that the submission is robust and that residential development can take place within a safe environment.
129. Whilst the site has not flooded in the recent flooding associated with the River Thames, the proposal will nevertheless make provision for the enhanced flood defence levels required under TE2100 and floor levels that in the main are set 300mm above the 1 in 100 year (+20% climate change) level.
130. A dry means of escape from the development can be provided with the potential for use by others locally.
131. Therefore no change.

### *Archaeology*

132. The site is located adjacent to an Area of Archaeological Potential designated by the Council. A mitigation strategy is therefore proposed that can be secured by condition attached to the grant of planning permission to safeguard any archaeological assets.
133. No change.

### *Ecology*

134. We have considered the effect on the ecology of the site with it adjoining the River Thames and having a number of existing trees. Integration of nature conservation into a landscape management plan will ensure the biodiversity of the new site and retained existing features for the long term.
135. Biodiversity is integral to the landscaping of the new riverside walkway.
136. No change.

### *Built Heritage*

137. A sliver of the site is within a designated conservation area and it contains a Building of Townscape Merit (BTM). The removal of the existing buildings from the site will be beneficial to both and also the wider setting of the listed Teddington Footbridge. The new buildings have all been designed with these assets in context and therefore provide an enhanced setting for the riverside area generally.
138. Development of the site is therefore considered to be beneficial to the built heritage.
139. No change

### *Noise*

140. We have considered the effects of the proposal in terms of noise. The proposed use of the site is not a noise generating use and the existing use is not particularly noisy so the overall effect on the noise climate will be neutral.
141. Appropriate glazing specification will address any external noise in the area in order to safeguard the living conditions of future residents.
142. No change.

### *Air Quality*

143. We have considered the effects of the proposal on air quality. It is not considered that there will be any adverse effect on air quality as a result of the proposal.
144. Further submissions have been made regardless the basement car parking. These no do result in any change in our conclusions.

### *Landscape, Townscape and Visual Quality*

145. We have considered the effects of the proposal on the landscape and visual receptors. The site is visible from a number of locations and development as proposed will therefore change the view from these, although from some the change will be negligible or imperceptible.
146. It is considered that the proposed development will see the site change from being dominated by a mix of larger scale commercial buildings and areas of hard standing to an area of residential blocks with increased visual permeability towards the river. Together with access to the river and high quality landscaping and material there will be an overall enhancement of the site.
147. Further submissions have been made to aid the interpretation of the scheme in the viewpoints around the site considered in the ES. In addition the extent and nature of the different areas of space within the proposed development have been quantified and clarified to aid interpretation of the drawings.
148. These continue to show the beneficial effect of the development in opening up the riverside, where there is currently no access.

### *Transport*

149. We have considered the effect of traffic related to the development. The conclusion is that there will be a net reduction in the number of vehicular trips generated by the site which is likely to improve conditions on the local highway network.
150. No change

### *Wind*

151. We have considered the effects of the development in terms of wind disturbance. There are no effects off site.
152. On site even in the windiest season the wind microclimate at ground level will be suitable for leisure walking, standing and sitting. In the summer the site is expected to be comfortable for sitting in the garden areas and along the waterfront.
153. Further submissions have been made in respect of the interpretation of the results. No change is needed to our conclusions.

### *Sunlight/Daylight*

154. We have considered the effects of the development in terms of sunlight/daylight. There are no adverse impacts in this respect arising from the proposed development.
155. Further analysis of the level of daylight/sunlight received has been undertaken in response to comments from the BRE. Refinement of the design of some of the proposed units has been undertaken to demonstrate that all relevant rooms meet BRE standards.

### *Sustainability*

156. We have considered the effects of the development on sustainability. The design of the development includes for sustainable construction methods and for the provision of renewable energy sources that will result in a reduction in carbon emissions.
157. To address comments from the GLA the Energy and Sustainability submissions have been enhanced with consideration of the proposal against the GLA SPG. Overall this continues to demonstrate that the scheme is energy efficient and sustainable.



### *Cumulative Effects*

158. Finally we have considered the cumulative effects of the development on the environment. We do not consider that there are any adverse cumulative effects of the development or in conjunction with the proposed Ham Hydro scheme.
159. Any effects that do arise from the development are capable of mitigation as indicated in this Statement. There will be no residual effects to the site or to the environment.
160. No change
161. We therefore conclude that the site can be developed as proposed without adverse effect on the environment of the area.

**CgMs Limited**

**August 2014**