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GREATER LONDON AUTHORITY

Development, Enterprise and Environment

Bryan Staff

Team Leader (Development Management West Team), Street Scene & Development
London Borough of Richmond upon Thames
Civic Centre
44 York Street
Twickenham
TW1 3BZ

Our ref: D&P/3265/PS
Your ref: 14/0914/FUL
Date: 25 November 2014

Dear Mr Staff

**Town and Country Planning Act 1990 (as amended);
Greater London Authority Act 1999;
Town and Country Planning (Mayor of London) Order 2008**



**Teddington Studios, Broom Road, TW11 9NT
14/0914/FUL**

Thank you for your letter of 17 November 2014 informing the Mayor that the London Borough of Richmond upon Thames has resolved that it is minded to grant permission for the above planning application.

I hereby give notice that your Stage II referral was received complete on 17 November 2014 and that the fourteen day period allowed to the Mayor will therefore terminate on 30 November 2014.

If you have any queries at this stage, please contact Sarah Considine on 020 7983 5751.

Yours sincerely

Development & Projects

cc: Tony Arbour, London Assembly Constituency Member
Nicky Gavron, Chair of London Assembly Planning and Housing Committee
National Planning Casework Unit, DCLG
Alex Williams, Transport for London

MAYOR OF LONDON

W.

Bryan Staff

Richmond upon Thames Council
Civic Centre
44 York Street
Twickenham
LONDON TW1 3BZ

Our ref: D&P/3265SC07

Your ref: 14/0914/FUL

Date: 25 November 2014

Dear Mr Staff

**Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008
Teddington Studios**

I refer to your email of 23 October 2014 informing the Mayor that Richmond upon Thames Council is minded to grant planning permission for the above planning application. I refer you also to the notice that was issued on 25 November 2014 under the provisions of article 5(1)(b)(i) of the above Order.

The Mayor has delegated his planning powers to me, and having now considered a report on this case (reference D&P/3265/02, copy enclosed), I am content to allow Richmond upon Thames Council to determine the case itself, subject to any action that the Secretary of State may take, and do not therefore wish to direct refusal.

Yours sincerely



Sir Edward Lister

Deputy Mayor and Chief of Staff

cc Tony Arbour, London Assembly Constituency Member
Nicky Gavron, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Alex Williams, TfL



Teddington Studios

in the London Borough of Richmond upon Thames

planning application no. 14/0914/FUL

Strategic planning application stage II referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

The proposal

Redevelopment to provide 213 residential units, with associated parking, landscaping, and access.

The applicant

The applicant is **Haymarket Media**, and the architect is **tp bennett**.

Strategic issues

The principle of the redevelopment of this site for housing is supported. Outstanding strategic planning concerns relating to **affordable housing, urban design, climate change** and **transport** have been satisfactorily addressed, and the application is now acceptable.

The Council's decision

In this instance Richmond upon Thames Council has resolved to grant permission.

Recommendation

That Richmond upon Thames Council be advised that the Mayor is content for it to determine the case itself, subject to any action that the Secretary of State may take, and does not therefore wish to direct refusal or direct that he is to be the local planning authority.

Context

1 On 22 April 2014 the Mayor of London received documents from Richmond upon Thames Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. This was referred to the Mayor under Category 1A of the Schedule to the Order 2008: *"Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats"*.

2 On 29 May 2014 the Mayor considered planning report D&P/3265/01, and subsequently advised Richmond upon Thames Council that whilst the principle of the proposal was supported, the application did not comply with the London Plan, for the reasons set out in paragraph 64 of the report. However, the resolution of those issues could lead to the application becoming compliant with the London Plan.

3 A copy of the above-mentioned report is attached. The essentials of the case with regard to the proposal, the site, case history, strategic planning issues and relevant policies and guidance are as set out therein, unless otherwise stated in this report. On 23 October 2014 Richmond upon Thames Council decided that it was minded to grant planning permission, and on 17 November 2014 it advised the Mayor of this decision and subsequently issued a complete referral. Under the provisions of Article 5 of the Town & Country Planning (Mayor of London) Order 2008 the Mayor may allow the draft decision to proceed unchanged, direct Richmond upon Thames Council under Article 6 to refuse the application or issue a direction to Richmond upon Thames Council under Article 7 that he is to act as the Local Planning Authority for the purposes of determining the application and any connected application. The Mayor has until 30 November 2014 to notify the Council of his decision and to issue any direction.

4 The decision on this case, and the reasons will be made available on the GLA's website www.london.gov.uk.

Update

5 At consultation stage Richmond upon Thames Council was advised that whilst the principle of the proposal was supported, the application did not comply with the London Plan, for the reasons set out in paragraph 64 of the above-mentioned report. However, the resolution of those issues could lead to the application becoming compliant:

- **Housing:** the provision of a financial contribution in lieu of on-site affordable housing was not acceptable and contrary to London Plan Policy 3.12. Furthermore, the provision of solely intermediate housing was contrary to London Plan Policy 3.11. It was also not possible to determine whether the proposal provides the maximum reasonable amount of affordable housing in accordance with London Plan Policy 3.12.
- **Urban design and housing quality:** the proposal raised concern with regards to ground-floor layout, number of units per core, and aspect, and was required to be amended to accord with London Plan design policies. Further views of the development from the listed footbridge were also required to allow for a more detailed assessment of this relationship and the impact of the development on the listed structure and conservation area.
- **Inclusive design:** the proposed ground-floor access arrangement did not respond to London Plan inclusive design principles, and was required to be reviewed. Further information regarding the riverside walkway and garden was also required to ensure it is accessible to all.
- **Climate change adaptation:** in accordance with London Plan Policy 5.3, the applicant was required to submit a sustainability statement demonstrating that the proposal meets at least the Mayor's priority standards set out in the Mayor's Sustainable Design and Construction Supplementary Planning Guidance, and where possible the Mayor's best practice standards.
- **Climate change mitigation:** further information regarding cooling was required, and in order to verify the energy efficiency savings given from energy efficiency measures alone, the applicant was required to provide sample TER and DER output sheets. A drawing demonstrating the route of the heat-network linking all blocks, in addition to the floor area and location of the energy centre, was also required, together with a plan of the photovoltaic array. Finally, given the carbon dioxide emissions savings fall short of the target set out in London Plan Policy 5.2, the applicant was required to review the strategy to identify additional measures.

- **Blue Ribbon Network and flooding:** in accordance with London Plan Policy 5.12, the applicant was required to ensure that issues regarding flood risk are appropriately addressed and mitigated.
- **Transport:** electric vehicle charging points, a construction logistics plan, and delivery and servicing plan were all required to be secured by condition. The travel plan, Controlled Parking Zone exclusion, car club incentives and Thames Pathway signage were also required to be secured through the section 106 agreement.

Principle of development

6 The principle of the redevelopment of this site for housing was supported at consultation stage in accordance with strategic policy. However, it was unclear previously whether this proposal was being brought forward in partnership with off-site delivery of employment use, and whether any proposed off-site employment provision was adversely impacting on overall viability.

7 As part of the release of this site for housing, and in order to retain its office functions in the borough, the applicant had originally intended to bring forward a new office building on the Richmond College site, which is currently the subject of emerging redevelopment proposals. However, at this stage it has not been possible for the applicant to secure the delivery of its office function on the college site, and an alternative option is being pursued, which is likely to involve temporary use of existing office floorspace within the borough. Nevertheless, the applicant is proposing to develop a tech-hub building as part of the college site. This specialist unit will provide media workspace aimed at enabling collaboration with the college, providing college students with opportunities to work directly with Haymarket staff in its digital labs, photographic studios and digital editing suites. This facility will deliver enhanced education and skills provision in partnership with a further education provider, and is strongly supported in accordance with London Plan Policy 3.18. Whilst affordable housing, and transport, is given the highest priority at the strategic level, Policy 8.2 of the London Plan does also acknowledge the need for planning obligations to fund social infrastructure. In this context, the delivery of this centre is supported, and has been appropriately secured by the Council. Furthermore, the Council has secured a £5,000,000 financial contribution towards affordable housing in the event that this facility is not delivered within five and half years from grant of planning permission.

8 As detailed in the Mayor's consultation report, whilst the retention of office floorspace as part of any redevelopment proposal is not a strategic priority, the loss of the office floorspace would be contrary to local policy. As such, and in recognition that the applicant is no longer pursuing office provision as part of the Richmond College site redevelopment, the Council has secured a financial penalty of £5,000,000 should the applicant not locate to alternative premises within the borough within five and a half years from grant of planning permission. This penalty would be directed entirely towards affordable housing provision, and forms an additional payment beyond the agreed financial contributions as set out in paragraph twelve below, and as such is acceptable.

9 In summary, the provision of a specialist educational facility as part of this application is strongly supported in accordance with strategic policy. The retention of the existing employment use within the borough, whilst not a strategic priority, is also supported, and the additional contribution towards affordable housing secured through a penalty payment, which is supplementary to the substantive financial contributions secured as part of this application, is welcomed. The principle of the application is therefore acceptable.

Housing

10 At consultation stage, it was not possible to determine whether the proposal provides the maximum reasonable amount of affordable housing in accordance with London Plan Policy 3.12. The provision of a financial contribution in lieu of on-site affordable housing was also raised, in addition to the provision of solely intermediate housing, on-site.

11 When previously reported, the application included twelve on-site intermediate units in addition to a £3,000,000 payment in lieu of on-site affordable housing.

12 The applicant's viability report has been subject to independent assessment on behalf of the Council. This assessment concluded that additional funds would be generated by the sale of the proposed units than that originally reported by the applicant. Subsequently the applicant has amended its overall section 106 package to include an £8,000,000 payment in lieu of on-site affordable housing provision, in addition to the tech hub, on-site intermediate units, and other contributions including those relating to transport, public realm, health and education. The total of these contributions amounts to approximately £19,100,000, which is broadly in accordance with the predicted surplus calculated by the Council's independent assessment of the applicant's viability, and as such represents the maximum reasonable amount.

13 As detailed in the Mayor's consultation report, the London Plan, together with the Mayor's Housing SPG, makes clear that affordable housing is expected to be provided on-site, and that off-site provision is to be seen as truly exceptional, and is only acceptable where an alternative site or sites have been identified, and where the off-site affordable provision can be delivered prior to the market component. A cash in lieu contribution is only acceptable when demonstrable benefits are brought to affordable housing provision.

14 The applicant has resisted all attempts to increase the proportion of on-site affordable housing, and has not sought to bring forward a donor site to support off-site delivery, which is disappointing. The applicant has retained its payment in lieu approach, which has subsequently been accepted by the Council.

15 The Council has sought to provide the robust justification required to allow for a payment in lieu to be considered acceptable. This primarily relies on the overall benefits of retaining the employment use within the borough, in addition to the delivery of the tech hub by the applicant, and the reported gains in overall affordable housing delivery resulting from the use of a payment in lieu approach. Paragraph 3.74 of the London Plan does specify that securing a higher provision of affordable housing, and sustaining strategically important clusters of economic activity, may constitute exceptional circumstances to support a payment in lieu approach.

16 Whilst the borough of Richmond upon Thames falls outside of any strategically important clusters of economic activity, primarily considered to be the Central Activities Zone and the north of the Isle of Dogs, the benefit of retaining a major employer within a London borough is fully acknowledged, and supported. The delivery of the tech-hub is also fully supported in accordance with London Plan Policy 3.18, and helps deliver the strategic improvements to further education that are actively being sought through the Plan.

17 The Council has provided details on its affordable housing programme, which seeks to provide comfort that the funds secured as part of this application will be used in a timely manner to provide additional affordable homes. As part of this a number of specific schemes have been identified.

18 GLA officers remain of the view that on-site affordable housing is deliverable, and are disappointed with the applicant's approach to this issue in planning discussions. However, it is accepted that the proposal does provide a number of additional benefits, and delivers strategic objectives relating to employment and skills provision. Furthermore, the Council has provided detail on its intended use of the payment, which has been increased significantly since the original submission. On balance, the application is acceptable with regards to housing provision.

Urban design

19 At consultation stage, the proposal raised concern with regards to ground-floor layout, number of units per core, and aspect, and was required to be amended to accord with London Plan design policies. Further views of the development from the listed footbridge were also required to allow for a more detailed assessment of this relationship and the impact of the development on the listed structure and conservation area. The proposed ground-floor access arrangement did not respond to London Plan inclusive design principles, and was also required to be reviewed. Further information regarding the riverside walkway and garden was also required to ensure it is accessible to all.

Residential quality and inclusive design

20 Following the Mayor's consultation report the applicant has made a number of significant changes to residential layout. Individual access points directly from the public realm into the ground-floor units have now been provided, which secures demonstrable benefits to residential quality, and responds positively to comments made previously. The applicant has amended the location and layout of the residential entrance lobbies for blocks B and D in order to prioritise the east-west street, to simplify the ground-floor, as well as increase the prominence of the individual ground-floor access points on the route through to the river, and is welcomed. The applicant has also amended the residential floorplans on the upper floors, reducing the number of units served by each core, and reducing overall circulation space, which is strongly supported, and responds to comments made previously. Furthermore, the applicant has amended the scheme to provide direct level access to the river walkway, addressing concerns raised previously regarding inclusive design.

21 It is disappointing that the applicant has not reduced the proportion of single-aspect units by introducing through-units, and GLA officers remain of the view that an amended layout could be delivered to address this point. However, it is acknowledged that a number of significant changes have been made in response to the Mayor's consultation report, and that the issue of single-aspect units needs to be assessed in the context of overall residential quality. The applicant has provided an assessment of the proposal against the standards established in the Mayor's Housing Supplementary Planning Guidance, which demonstrates broad compliance. On balance, whilst it is disappointing that the level of single-aspect units has not been reduced and as such the proposal cannot be considered to represent best practice, given the substantial improvements made to residential quality as a direct result of the amendments secured by GLA officers, the proposal is broadly acceptable with regards to residential quality.

22 Finally, and as previously highlighted by GLA officers in discussions with the applicant, the lobby arrangements currently provide unnecessarily convoluted access to post-points for the residents, and do not embrace good practice inclusive design principles. Whilst it is acknowledged that this is a point of detail and not of strategic concern, the applicant is strongly encouraged in the detailed design stage to amend the arrangement to provide direct and convenient access, avoiding the need for residents to use steps/lifts to access their post.

Impact on heritage assets

23 As set out at consultation stage, given that the height of the proposal is taller than the contextual height of the surrounding area, and given its location on the River Thames, within and adjacent to a conservation area, and in close proximity to a listed bridge structure, the impact of the development from river views is critical. The applicant has sought to breakdown the mass of the buildings by stepping the upper floors. The use of finger blocks also helps in reducing the scale and bulk of development, particularly when compared to the existing buildings. The applicant's architectural approach is simple, with limited unnecessary articulation and generous windows, creating traditional riverside wharf-style buildings, and as such is strongly supported.

24 In response to concerns raised by English Heritage, the applicant provided an additional view of the development to allow for a complete assessment of the development's impact on the Teddington Lock Conservation Area. The views assessment demonstrates that whilst the buildings will be taller than the existing riverside building, the use of finger blocks with a stepped design, together with the setting back of the building line from the River and the inclusion of a significant area of soft landscaping, successfully serves to mitigate their impact. Furthermore, the Council has undertaken a local assessment of the impact of the development on heritage assets and concluded that the impact on the Teddington Lock Conservation Area is acceptable.

25 On balance, the proposal is therefore acceptable with regards to strategic design policies.

Climate change

Climate change adaptation

26 As requested at consultation stage, and in accordance with London Plan Policy 5.3, the applicant has subsequently submitted a sustainability statement. Measures proposed include a sustainable drainage strategy, to include biodiverse roofs, permeable surfaces and rainwater harvesting, together with the use of low energy lighting and energy efficient appliances, metering, high levels of insulation, and low water use sanitary-ware and fittings. The statement addresses comments made previously, and the proposal is therefore acceptable with regards to London Plan policies relating to climate change adaptation.

Climate change mitigation

27 At consultation stage, further information regarding cooling was required, and in order to verify the energy efficiency savings given from energy efficiency measures alone, the applicant was required to provide sample TER and DER output sheets. A drawing demonstrating the route of the heat-network linking all blocks, in addition to the floor area and location of the energy centre, was also required, together with a plan of the photovoltaic array. Finally, given the carbon dioxide emissions savings fall short of the target set out in London Plan Policy 5.2, the applicant was required to review the strategy to identify additional measures.

28 The applicant has submitted an amended strategy including further information on glazing ratios and how the demand for cooling will be minimised; sample modelling outputs supporting the efficiency savings claimed; a plan demonstrating the size, layout and location of the heat network and energy centre; and information regarding the sizing of the combined heat and power plant, together with confirmation that the electricity generated will be used to meet the landlord supply or will be exported to the grid. The amended strategy confirms that the proposal accords with the carbon dioxide emissions saving targets set out in London Plan Policy 5.2, and as such the application is acceptable with regards to strategic policies relating to climate change mitigation.

Blue Ribbon Network and flooding

29 At consultation stage, the applicant was required to ensure that issues regarding flood risk are appropriately addressed and mitigated. The applicant has submitted a revised flood risk assessment in response to detailed comments made by the Council and Environment Agency. The revised assessment satisfactorily addressed concerns raised by both parties, and the latter subsequently withdrew an outstanding objection to the application on grounds of flooding.

Transport

30 At consultation stage electric vehicle charging points, a construction logistics plan, and delivery and servicing plan were all required to be secured by condition. The travel plan, Controlled Parking Zone exclusion, car club incentives and Thames Pathway signage were also required to be secured through the section 106 agreement.

31 The section 106 agreement includes a transport payment of £1,421,618, and a public realm payment of £226,321.80 to widen the footway of Broom Road. The development will result in provision of two new vehicular accesses from Broom Road, and extensive riverside public realm improvement works.

32 At consultation stage, TfL sought provision of land to ensure the continuation of the publicly accessible riverside walk. The legal agreement attached to the draft grant of planning permission will obligate the applicant to provide a publicly accessible pedestrian walkway from Broom Road to the frontage of the site with the River Thames, and along the site's frontage with the River Thames. TfL and the Council have requested that this riverside walkway be publicly accessible 24-hours a day, and should include Thames Path signage. These requirements are expected to be secured through the final legal agreement. The Council has confirmed that TfL will be informed of, and contribute to, all section 106 negotiations relating to transport, including discussions regarding the accessibility of the riverside walk.

33 In response to comments made at consultation stage, provision of electric vehicle charging points in accordance with the Revised Early Minor Alterations to the London Plan, and provision of an on-site car club parking space, has been secured through the legal agreement. A travel plan, construction method statement, piling plan, and delivery and servicing plan, have also been secured through condition, the discharge of which shall be undertaken in consultation with TfL. Funding, monitoring and review of the travel plan must also be secured through the section 106 agreement.

34 The scheme is liable for Mayoral Community Infrastructure Levy (CIL) which formally came into effect on 1 April 2012. The applicant and Council are reminded that the rate for Richmond upon Thames is £50 per square metre, payable upon commencement. This must be calculated and collected by LB Richmond upon Thames.

35 On balance the application scheme is acceptable and broadly accords with the strategic transport policies of the London Plan.

Response to consultation

Local neighbourhood consultation

36 Richmond upon Thames Council publicised the application by sending notifications to all adjoining owners and occupiers. A total of 53 representations were received in response to two rounds of local neighbourhood consultation, 52 of which raised objection to the proposal. In summary, the following issues were raised:

- **Land use:** loss of the existing studio; loss of a cultural and heritage facility, which should be listed; and loss of employment space.
- **Design:** overdevelopment of the site; proposal too high and out of character; insensitive and unimaginative design; and increase in noise pollution.
- **Transport:** the traffic survey conducted by the applicant was undertaken during the school holidays when residents were away.
- **Other:** high flood risk.

37 One letter of support was received, stating that the development would enable the existing occupier and applicant to move to a more appropriate site, retaining employment within the borough.

38 Matters relating to the loss of the existing studio and employment use were addressed in the Mayor's consultation report. As detailed in paragraphs seven and eight of this report, the applicant is in the process of finding alternative office accommodation within the borough, and the Council has secured a financial penalty should the applicant move its operation out of the borough. This will ensure the long-term retention of the existing employment use.

39 With regards to the objections raised relating to design, as stated in the urban design section of this report, the height and massing raises no strategic concerns, and the architectural approach creates a simple massing, and an elegant and legible building form. Matters relating to relating to impact on local amenity, including noise, have been appropriately assessed by the local authority, who concluded that the proposed development is acceptable. Finally, matters relating to transport have been assessed and found to be acceptable by the local planning authority, and Transport for London.

Statutory consultees and local bodies

40 The following statutory consultees provided a consultation response to this application:

- **The Teddington Society:** provided overall support for the application, although expressed reservation regarding the design, raised concerns over the loss of employment floorspace, and requested the studio use be commemorated within the development.
- **Environment Agency:** initially objected to the application on the grounds that the development had not met the flood risk exception test. Following the submission of a revised flood risk assessment, this objection was withdrawn.
- **English Heritage:** raised no objection, but considered that the proposal will harm the historic environment by failing to preserve and enhance the character of the Thames and Teddington Lock Conservation Area due to the scale, height, mass, linearity, and design.

- **Natural England:** concluded that the proposal is unlikely to affect any statutorily projected sites or landscapes. The application of standing advice on protected species should be applied.
- **Thames Water:** raised no objection to the proposal, but sought conditions relating to waste, surface water drainage, piling, ground water discharge, risk of backflow and petrol/oil interceptors. The Council has included a number of conditions in response to comments made by Thames Water.

41 Matters relating to design are addressed in paragraphs 23 to 25 of this report, in addition to the Mayor's consultation report. The Council, in its determination of the application, concluded that the development's impact on both the open and verdant character of the River Thames, and the conservation area, is acceptable.

Article 7: Direction that the Mayor is to be the local planning authority

42 Under Article 7 of the Order the Mayor could take over this application provided the policy tests set out in that Article are met. In this instance the Council has resolved to grant permission with conditions and a planning obligation, which satisfactorily addresses the matters raised at stage 1, therefore there is no sound planning reason for the Mayor to take over this application.

Legal considerations

43 Under the arrangements set out in Article 5 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor has the power under Article 6 to direct the local planning authority to refuse permission for a planning application referred to him under Article 4 of the Order. He also has the power to issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. The Mayor may also leave the decision to the local authority. In directing refusal the Mayor must have regard to the matters set out in Article 6(2) of the Order, including the principal purposes of the Greater London Authority, the effect on health and sustainable development, national policies and international obligations, regional planning guidance, and the use of the River Thames. The Mayor may direct refusal if he considers that to grant permission would be contrary to good strategic planning in Greater London. If he decides to direct refusal, the Mayor must set out his reasons, and the local planning authority must issue these with the refusal notice. If the Mayor decides to direct that he is to be the local planning authority, he must have regard to the matters set out in Article 7(3) and set out his reasons in the direction.

Financial considerations

44 Should the Mayor direct refusal, he would be the principal party at any subsequent appeal hearing or public inquiry. Government guidance in Circular 03/2009 (*Costs Awards in Appeals and Other Planning Proceedings*) emphasises that parties usually pay their own expenses arising from an appeal.

45 Following an inquiry caused by a direction to refuse, costs may be awarded against the Mayor if he has either directed refusal unreasonably; handled a referral from a planning authority unreasonably; or behaved unreasonably during the appeal. A major factor in deciding whether the Mayor has acted unreasonably will be the extent to which he has taken account of established planning policy.

46 Should the Mayor take over the application he would be responsible for holding a representation hearing and negotiating any planning obligation. He would also be responsible for determining any reserved matters applications (unless he directs the council to do so) and determining any approval of details (unless the council agrees to do so).

Conclusion

47 The principle of the redevelopment of this site for housing is supported in accordance with strategic policy. The issues raised at consultation stage regarding affordable housing, urban design, climate change and transport, have all been addressed, and the application is now acceptable in strategic planning terms.

for further information, contact GLA Planning Unit (Development & Projects team):

Colin Wilson, Senior Manager – Development & Projects

020 7983 4783 email colin.wilson@london.gov.uk

Justin Carr, Strategic Planning Manager (Development Decisions)

020 7983 4895 email justin.carr@london.gov.uk

Sarah Considine, Principal Strategic Planner, case officer

020 7983 5751 email sarah.considine@london.gov.uk

Teddington Studios

in the London Borough of Richmond upon Thames

planning application no. 14/0914/FUL

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

The proposal

Redevelopment to provide 219 residential units, with associated parking, landscaping, and access.

The applicant

The applicant is **Haymarket Media**, and the architect is **tp bennett**.

Strategic issues

The principle of the redevelopment of this site for housing is supported. However, there are a number of outstanding strategic planning concerns relating to **affordable housing, urban design, climate change** and **transport**.

Recommendation

That Richmond upon Thames Council be advised that, whilst the principle of the redevelopment of this site for housing is supported, the application does not comply with the London Plan, for the reasons set out in paragraph 64 of this report. However, the resolution of those issues could lead to the application becoming compliant with the London Plan.

Context

1 On 22 April 2014 the Mayor of London received documents from Richmond upon Thames Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 2 June 2014 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 1A of the Schedule to the Order 2008: *"Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats"*.

3 Once Richmond upon Thames Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 The 1.8 hectare riverside site is located in Teddington. The site is bound to the north by the River Thames and Teddington Lock, to the east by The Lensbury private health club, to the south by Broom Road, and to the west by The Anglers public house. The wider area is predominantly residential in character, with a number of education and leisure uses, together with two public houses in close proximity to the site.

6 The site is currently occupied by Haymarket Media Group, and Teddington television studios. The existing buildings on site range in height from one to seven storeys, are a mix of architectural styles, and include a multi-storey car park building. Weir Cottage, a two-storey L-shaped brick house falls within the site at its south-western boundary. This building is situated within Teddington Lock Conservation Area, with the remainder of the application site abutting the conservation area to the west and north. Immediately to the north-west of the site sits the Grade II listed Teddington Footbridge.

7 The site is approximately two kilometres south of Kingston Bridge, and Hampton Court Road, which form part of the Strategic Road Network, and approximately three kilometres from Chertsey Road (A316), which forms part of the Transport for London Road Network. Mainline rail services are available at Teddington station, approximately 1,150 metres from the site. Four day bus services and two night bus services are available within acceptable walking distance. Consequently, the site has a public transport accessibility level of two (on a scale of one to six, where 6b is the most accessible).

Details of the proposal

8 Haymarket Media is seeking full planning permission to redevelop the site to provide 219 residential units, with associated parking, open space, and access.

Case history

9 The application considered here was subject to formal pre-planning application discussions with GLA officers, with a meeting being held on 28 October 2013 (D&P/3265/pre-app). GLA officers welcomed the opportunity to engage with the applicant at an early stage in the development process, and supported the principle of the redevelopment of this site for housing. However, a number of concerns were raised regarding the need to maximise affordable housing, which was required to be delivered on-site, in addition to the design of the proposal, and residential quality. Further discussion and information was also required regarding housing, design, inclusive design, climate change and transport.

10 In October 2013 Richmond upon Thames Council consulted on its draft Site Allocations Development Plan Document, which sought to designate this site for redevelopment for housing, subject to the re-provision of office floorspace. On 12 November 2013 the GLA issued a formal response to the public consultation (D&P/LDF27/DPD01/SC01), and concluded that whilst the redevelopment of the site for housing is supported in principle, the document was required to make explicit reference to the need to ensure that any residential development at the Teddington Studios site will be required to include on-site affordable housing. Furthermore, whilst the Council's aspiration to retain the existing office occupier within the borough, was supported, it was made clear that the cross-subsidisation of office floorspace by housing, to the detriment of affordable housing provision, would not be supported.

Strategic planning issues and relevant policies and guidance

11 The relevant issues and corresponding policies are as follows:

- Housing *London Plan; Housing SPG; Housing Strategy; draft Revised Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context, draft SPG*
- Affordable housing *London Plan; Housing SPG; Housing Strategy; draft Revised Housing Strategy*
- Density *London Plan; Housing SPG*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context, draft SPG; Housing SPG; London Housing Design Guide; Shaping Neighbourhoods: Play and Informal Recreation SPG*
- Access *London Plan; Draft Accessible London: achieving an inclusive environment SPG*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy*
- Transport *London Plan; the Mayor's Transport Strategy*
- Parking *London Plan; the Mayor's Transport Strategy*

12 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is Richmond upon Thames Council's Core Strategy (2009) and Development Management Plan (2011), and the 2011 London Plan (with 2013 Alterations).

13 The Council's draft Site Allocations Development Plan Document (October 2013), the draft Further Alterations to the London Plan (January 2014), and the National Planning Policy Framework and Technical Guide to the National Planning Policy Framework, are also relevant material considerations.

Principle of development

Office floorspace

14 The London Plan does not identify this site as Strategic Industrial Land, and it does not fall within the Central Activities Zone. London Plan policies support office rejuvenation within the CAZ to improve the quality and flexibility of office stock, in order that it can meet the distinct needs of the central London office market. Outside of the CAZ, London Plan policies support the consolidation and extension of London's diverse office markets, whilst facilitating the redevelopment of surplus office space for other uses, including housing and mixed-use development. The London Office Policy Review 2012 illustrates the great variability in the attractiveness and success of outer and inner London office markets, and supports the concept of focussing demand on the most viable and competitive business locations.

15 The existing site includes a significant proportion of office floorspace, which is not proposed to be replaced on-site. As set out above, strategic policy does not provide explicit protection for existing office use, but supports its retention and consolidation where viable, and allowing for its release where demand is low.

16 At the local level, the Council seeks to retain land in employment use within its Core Strategy. The loss of the office floorspace is not therefore in accordance with local policy. However, the Council, in its emerging Site Allocations Development Plan Document, does identify this site as

suitable for housing, subject to the delivery of replacement office provision, either on this site, or as part of the redevelopment of the Richmond College Site.

17 The applicant is proposing the redevelopment of this site solely for housing, with office floorspace to be delivered on an alternative site, although no details regarding this off-site provision have been provided. Whilst the principle of this approach does not raise strategic concern, as made clear in discussions with the applicant and the Council, the strategic priority in redeveloping the Teddington Studio site for housing is to maximise the delivery of affordable housing, which should be delivered on-site in accordance with London Plan Policy 3.12. There is concern regarding the applicant's viability report accompanying this application, which indicates that a significant capital receipt is being directed towards the redevelopment of Haymarket's global headquarters elsewhere within the borough, compromising the proportion of affordable housing.

Housing

18 London Plan Policy 3.3 provides explicit strategic support for the provision of housing within London. The draft Further Alterations to the London Plan sets a target for the Council to deliver a minimum of 3,150 homes in the Plan period 2011-2021. Given the site's context and location in a predominantly residential area, and the strategic priority afforded to housing, the principle of housing on this site as part of any redevelopment proposals is therefore supported. However, whilst the provision of housing is strongly supported, as discussed in paragraphs 22 to 25 below, the provision of off-site affordable housing is contrary to strategic policy and is not acceptable.

Television studio floorspace

19 The ongoing role of London in world class film and television production as part of the capital's arts and cultural offer is a strategic priority for the Mayor, as set out London Plan Policy 4.6, and it is therefore important to protect appropriate existing studio facilities. Following a review of the existing studio space, which would not be suitable for large-scale television productions, and in light of its scale and nature, its loss does not raise strategic concern. However, the studios do have a heritage value, and the applicant's proposal to reuse the existing plaques as part of the river walkway acts as a playful echo to this historic studio use, which is supported.

Summary

20 The principle of the redevelopment of this site for housing is supported in accordance with strategic policy. The aspiration of the Council, and the applicant, to retain the existing office provision within the borough, and to deliver this through a dual-site land-use strategy, is also supported in principle. However, no details regarding the off-site employment use has been provided, and there are serious strategic concerns regarding the approach to affordable housing, and the impact of the office reprovision on overall delivery. Further discussions regarding the off-site office provision are therefore required.

Housing

21 The application includes 219 residential units. A detailed housing schedule is provided below:

Unit type	Market	Affordable rent	Intermediate	Total
one-bed	41		4	45
two-bed	95		8	103
three-bed	65			65
Four-bed	6			6
Total	207	0	12	219

Affordable housing

22 London Plan Policy 3.12 requires borough councils to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes. The application includes twelve affordable housing units, equating to 5% of overall provision, in addition to a financial contribution of £3,000,000 towards off-site provision.

23 The applicant has submitted a financial viability report in support of its proposals, which is being independently assessed by the Council. It is therefore not possible at this stage to determine whether the application provides the maximum reasonable amount of affordable housing in accordance with London Plan Policy 3.12.

24 The London Plan, together with the Mayor's Housing SPG, makes clear that affordable housing is expected to be provided on-site, and that off-site provision is to be seen as truly exceptional, and is only acceptable where an alternative site or sites have been identified, and where the off-site affordable provision can be delivered prior to the market component. A cash in lieu contribution is only acceptable when demonstrable benefits are brought to affordable housing provision. As made clear to the applicant during pre-planning application discussions, the provision of a payment in lieu of on-site affordable housing cannot be justified in this instance, and is therefore contrary to strategic policy. All affordable housing should therefore be provided on site.

25 London Plan Policy 3.11 establishes a strategic target that 60% of affordable housing provision be for social housing (comprising social rent and affordable rent), and 40% for intermediate provision. The twelve affordable housing units proposed on-site are all identified for intermediate provision. No social housing is proposed. In response to comments made above regarding the unacceptability of off-site provision, the applicant should amend the proposal to include on-site affordable housing at a tenure split which appropriately reflects the strategic target set out in Policy 3.11.

Housing choice

26 London Plan Policy 3.8, together with the Mayor's Housing SPG, and the draft Revised Housing Strategy, seek to promote housing choice and a balanced mix of unit sizes in new developments. London Plan Policy 3.11 establishes that strategic priority be afforded to the provision of affordable family homes.

27 The application includes 71 family units, equating to 32% of total provision. Whilst this proportion of overall family accommodation is supported, the application does not appropriately respond to the strategic priority for family social housing. In providing on-site affordable housing,

the applicant should ensure that the provision of family housing is maximised within the social housing element in accordance with strategic priorities.

Housing quality and design

28 London Plan Policy 3.5 promotes quality in new housing provision, with further guidance provided by the Mayor's Housing SPG. Whilst the applicant has stated in its planning statement that all units will meet the space standards set out in London Plan Policy 3.5, it is not possible to confirm this through the accommodation schedule. A full list of unit sizes should therefore be provided to demonstrate that the proposal accords with London Plan Policy 3.5.

29 Limited information has been submitted regarding other components of residential quality, which is disappointing. Key factors such as floor-to-ceiling heights, orientation, maximising ground-floor individual access points, and number of units per core, are all essential to achieving high residential quality, and are of particular importance when assessing residential quality. A number of concerns regarding ground floor access and number of units per core are raised in the urban design section below, and should be addressed. Furthermore, the applicant should provide a detailed assessment of the units against the baseline and good practice standards set out in the Mayor's Housing SPG.

Density

30 The density of the development is 422 habitable rooms per hectare. This is within the London Plan guidance range of 200 to 450 habitable rooms per hectare for urban sites with a public transport accessibility level of two, as set out in London Plan Policy 3.4.

31 The density falls within the guidance range of the London Plan, and is therefore acceptable in principle. However, the applicant should note comments made in paragraphs 29 of this report regarding housing quality, and the concerns raised regarding urban design below.

Children's play space and amenity

32 London Plan Policy 3.6 seeks to ensure that development proposals include suitable provision for play and recreation. Further detail is provided in the Mayor's Shaping Neighbourhoods: Play and Informal Recreation Supplementary Planning Guidance. Using the methodology within the Mayor's SPG, the development is expected to be home to approximately 34 children, 29 of which are expected to be under five years old. In accordance with the Mayor's SPG, the development is therefore required to provide, as a minimum, 290 sq.m. of door-stop play provision for the under-five's.

33 The proposal incorporates a range of publicly accessible open spaces, including the provision of a riverside garden, which will incorporate both natural play features and timber play equipment along the River Thames to address the on-site requirement for younger children. The Council should secure the provision of this space, including appropriate play equipment.

34 Whilst the approach taken by the applicant to play space provision is broadly supported, it is important that the provision of play space is reviewed once affordable housing is provided on-site, to ensure that sufficient space is incorporated.

Urban design

35 Good design is central to all objectives of the London Plan. The apartments are laid out in a series of five to seven storey linear blocks perpendicular to the river and two lower three-storey blocks facing Broom Road. This creates a high density scheme taller than the surrounding contextual height, within and adjacent to a conservation area, and in close proximity to a listed building, which therefore needs to be of a high design quality to be acceptable.

36 The design of the scheme was discussed extensively at pre-planning application stage. The approach taken created a large amount of public open space that lacked use or animation as well as exposing the backs of the buildings facing Broom Road. Concerns were also raised relating to the quality of the ground floor units, the large proportion of single-aspect units and the ambiguous relationship to the future of the adjacent sites. Whilst some of these issues have been mitigated by creating private communal spaces to blocks A and C, and improvements have been made to the appearance of the buildings, which are welcomed, the design of the scheme is still not considered to be of a high enough quality, and raises serious strategic concern.

37 One of the defining factors of the success of public open space is the extent to which the design of development facing it will generate activity and encourage a sense of ownership. This can be achieved by providing habitable uses with a good distribution of entrances around its perimeter. At pre-application stage the applicant was advised to modify the scheme to provide all ground floor units facing the public realm with their own direct access to surrounding open spaces, giving residents a stronger sense of ownership over the spaces and bringing critical levels of activity to make them feel safe and well used. This has not been addressed and remains a concern as it severely compromises the use and sense of ownership residents have over these spaces. This is particularly critical at the river edge, to ensure that the public walkway and riverside garden feels safe, active and overlooked, and that residents have direct access to it.

38 The approach taken to ground floor access also raises inclusive design concerns, with, in some instances, a series of internal step arrangements, and convoluted ramped access to communal blocks, with residents negotiating up to five doors between the block threshold and the lifts. These issues are discussed in detail in paragraphs 42 to 44 below.

39 The applicant should therefore amend the proposal and locate duplex-units at ground-level, with front doors accessed directly from the public realm. Issues relating to flooding, which are currently dominating the design approach, should be addressed by locating habitable rooms on the upper floor. Alternatively, a compromised solution where stepped access is provided from each unit to the open space, and a convenient and direct level access is provided through the communal corridor could also be acceptable if well designed.

40 Concerns were also raised at pre-planning application stage regarding the residential quality of the scheme. These related to the long communal corridors and high proportion of single-aspect units, and have also not been addressed. Whilst a limited number of single-aspect dwellings are expected as a consequence of delivering high-density schemes, the proportion of these are to be restricted, and north-facing single-aspect dwellings are to be avoided. Furthermore, a critical aspect of the Mayor's Housing Supplementary Planning Guidance is minimising the number of households sharing communal space, so that no more than eight units share the same landing. This minimises the need for management, addresses potential security issues, and is a good practice standard required for all flatted accommodation. The current proposal includes two buildings that have long corridors that are designed to serve up to fifteen units on each floor, which is significantly higher than recommended. The use of fire doors does not mitigate the impact of this arrangement on residential quality. Given that both these buildings have multiple cores this issue can be easily avoided by extending units into the corridors separating them into smaller clusters as well as reducing corridor lengths. This approach can also serve to increase the proportion of dual-aspect

units by creating through units at the end of these corridors. Issues related to fire escape can be overcome through improved ventilation of corridors.

41 As stated above, the height of the proposal is taller than the contextual height of the surrounding area, and given its location on the River Thames, within and adjacent to a conservation area, and in close proximity to a listed bridge structure, the impact of the development from river views is critical. The applicant has sought to breakdown the mass of the buildings by stepping the upper floors. The use of finger blocks also helps in reducing the scale and bulk of development, particularly when compared to the existing buildings. The applicant has amended the architectural approach since pre-planning application stage and the resultant design is simple, with limited unnecessary articulation, with generous windows, creating traditional riverside wharf-style buildings, which is strongly supported. However, it is noted that English Heritage has raised objection to the height and massing, and its impact on oblique views from the listed footbridge. The applicant should provide additional views in response to the comments of English Heritage to allow for a more detailed assessment of this relationship.

Inclusive design

42 The aim of London Plan Policy 7.2 is to ensure that proposals achieve the highest standards of accessibility and inclusion, not just the minimum. Inclusive design principles if embedded into the development and design process from the outset help to ensure that all of us, including older people, disabled and Deaf people, children and young people, can use the places and spaces proposed comfortably, safely and with dignity.

43 In accordance with London Plan Policy 3.8, all of the residential units should meet Lifetime Homes standards, and 10% should be capable of easy adaptation for wheelchair users. Whilst the applicant has stated in its written submission that the proposal accords with these standards, there are a number of concerns regarding the accessibility of the blocks. As discussed in paragraph 38 above, wheelchair access to the blocks is, in some instances, convoluted, severely restricted, and does not reflect the principles of inclusive design. It is acknowledged that due to flood risk issues, access to ground floor units is challenging. Given this, it is imperative that a clear, simple and easy to negotiate communal entrance be provided to all blocks, and the use of internal steps be reduced to a minimum. The location of the wheelchair accessible units should be identified on plan, and reviewed in the context of the ground-floor access constraints.

44 The design of the riverside walkway also raises concern. The plans submitted indicate that a series of steps are located on the walkway, which will act as a barrier to many disabled people. It is acknowledged that the site is constrained due to its flood risk, however, it is important that safe, easy and inclusive access is provided to the river edge for all residents and visitors. The applicant should therefore provide further details regarding the layout, routes, and level changes along the river edge and riverside gardens to allow for an assessment of the quality of this route, and space, for all users.

Blue Ribbon Network and flooding

45 The site is located on the River Thames, which forms part of the Blue Ribbon Network, as identified by the London Plan. London Plan Policy 7.27 seeks to ensure that development proposals on the Blue Ribbon Network enhance its use, including for recreation. The applicant has sought to improve public access to the River through the provision of a new riverside public walkway and riverside garden, to enable both the residents of the development, and those existing in the wider community, to enjoy the river. This is strongly supported in accordance with Policy 7.27. However, the applicant should note comments made in paragraph 37 regarding the location of residential entrances along the river edge to ensure that this important route is appropriately activated and feels safe, active, and overlooked, and concerns raised in paragraph 44 regarding inclusive access to the water front.

46 In accordance with London Plan Policy 5.12, the applicant should ensure that issues regarding flood risk are appropriately addressed and mitigated. The Environment Agency has lodged an objection to the application in relation to flood risk, and as such the applicant is reviewing its flood risk assessment. It is vital that issues relating to flood risk are appropriately addressed in accordance with London Plan Policy. However, as discussed in the urban design section of this report, it is important that the ground floor access arrangements take account of both flood risk, and London Plan design principles. Further discussions regarding the relationship of these elements are essential.

Climate change

Climate change adaptation

47 In accordance with London Plan Policy 5.3, the applicant should submit a sustainability statement demonstrating that the proposal meets at least the Mayor's priority standards set out in the Mayor's Sustainable Design and Construction Supplementary Planning Guidance, and where possible the Mayor's best practice standards. Furthermore, in accordance with London Plan policies 5.10 and 5.11, the Council should secure the delivery of biodiverse roofs.

Climate change mitigation

48 The applicant has broadly followed the London Plan energy hierarchy to reduce carbon dioxide emissions. An appropriate range of passive design features, and demand reduction measures, have been included to reduce the carbon dioxide emissions of the development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include mechanical ventilation with heat recovery, and the use of accredited construction details to reduce thermal bridging. Further details should be provided on how the demand for cooling will be minimised, including information proposed glazing ratios. In addition, and in order to verify the energy efficiency savings given from energy efficiency measures alone, the applicant should provide sample DER and TER output sheets including energy efficiency measures proposed to support the savings reported.

49 The applicant has investigated district heating networks within the vicinity of the application site, and confirmed that the Teddington district heating opportunity area is located to the west. A commitment has been made to ensuring that the development is designed to allow for future connection to the network should one become available. This is welcomed and should be secured by the Council.

50 The applicant is proposing to install a site-wide heat network connecting all buildings and served by a single energy centre. A drawing demonstrating the route of the heat-network linking all blocks, in addition to the floor area and location of the energy centre, should be provided.

51 The applicant is proposing to install a 95 kW_e gas fired combined heat and power unit as the lead heat source for the site-wide heat network. The plant has been sized to provide the domestic hot water load, as well as a proportion of space heating. Monthly profiles of the energy demands for the site, including an indication of the proportion to be met by the proposed plant, should be provided to support the size of the system proposed. Information should also be provided regarding the electricity sales and management strategy for the combined heat and power plant.

52 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 200 sq.m of solar photovoltaic panels on the roofs of the dwellings. A plan demonstrating the proposed location of the photovoltaic array has been provided.

53 Overall the measures proposed result in a 39% reduction in regulated carbon dioxide emissions compared to a 2010 Building Regulations compliant development. The carbon dioxide savings fall

short of the 40% target set out in London Plan Policy 5.2. The application should consider the scope for additional measures (for example an increase in the photovoltaic panel array) to increase the carbon reduction. If it is demonstrated that there is no further potential for carbon dioxide emissions savings on-site, the applicant should liaise with the Council regarding off-site contributions.

Transport

Car and cycle parking

54 A total of 258 car parking spaces are proposed, including 43 blue badge spaces, equating to 1.17 spaces per unit. This provision is in accordance with London Plan maximum standards. The provision of electric vehicle charging points is welcomed; 20% of bays should have active provision and 20% should have passive provision. TfL welcomes provision of an on-site car club parking space; an operator should be identified and incentives for residents to use local car clubs should be provided and detailed in the travel plan. Residents should be excluded eligibility to apply for parking permits in the nearby Controlled Parking Zone (CPZ); this should be secured through the section 106 agreement or by condition. These measures should ensure overall compliance with London Plan Policy 6.13.

55 A total of 296 cycle parking spaces are proposed, including provision of six visitor spaces, which accords with London Plan standards, and is welcomed.

Other transport matters

56 The provision of land to ensure the continuation of the publicly accessible riverside walk is welcomed. Thames Pathway signage should be secured through the section 106 agreement or by condition. Lighting and CCTV should be provided on this link. Further details have been requested from the Council regarding the design of this route.

57 TfL welcomes the submission of a travel plan, which aims to promote sustainable travel to and from the site. The plan is considered to be of a good standard and has passed the ATTrBuTE assessment used by TfL to assess the content. The travel plan and all agreed measures therein should be secured, enforced, monitored and reviewed as part of the section 106 agreement.

58 A construction logistics plan and delivery and servicing plan, in line with London Plan Policy 6.14, should be secured by condition and discharged in consultation with TfL.

Community Infrastructure Levy

59 The Mayor has introduced a London-wide Community Infrastructure Levy (CIL) to help implement the London Plan, particularly policies 6.5 and 8.3 toward the funding of Crossrail. The rate for Richmond upon Thames is £50 per square metre. The required CIL should be confirmed by the applicant and Council once the components of the development have been finalised.

60 The Council intends to adopt a borough wide Community Infrastructure Levy (CIL) in 2014 for which this development may be liable. The items to be funded through the CIL will be set out in the Richmond CIL Regulation 123 list.

Local planning authority's position

61 The Council has yet to consider a report on this application at its planning committee. To date objections have been received by the Council from English Heritage and the Environment Agency.

Legal considerations

62 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

63 There are no financial considerations at this stage.

Conclusion

64 London Plan policies on housing, urban design, inclusive design, climate change, and transport are relevant to this application. Whilst the principle of the housing-led redevelopment of this site is supported, a number of serious strategic concerns are raised, and consequently the application does not accord with London Plan Policy. The following could address these deficiencies:

- **Housing:** the provision of a financial contribution in lieu of on-site affordable housing is not acceptable and contrary to London Plan Policy 3.12. Furthermore, the provision of solely intermediate housing is contrary to London Plan Policy 3.11. It is also not possible at this stage to determine whether the proposal provides the maximum reasonable amount of affordable housing in accordance with London Plan Policy 3.12.
- **Urban design:** the proposal raises concern with regards to ground-floor layout, number of units per core, and aspect, and should be amended to accord with London Plan design policies. Further views of the development from the listed footbridge should also be provided to allow for a more detailed assessment of this relationship and the impact of the development on the listed structure and conservation area.
- **Inclusive design:** the proposed ground-floor access arrangement does not respond to London Plan inclusive design principles, and should be reviewed. Further information regarding the riverside walkway and garden is also required to ensure it is accessible to all.
- **Climate change adaptation:** in accordance with London Plan Policy 5.3, the applicant should submit a sustainability statement demonstrating that the proposal meets at least the Mayor's priority standards set out in the Mayor's Sustainable Design and Construction Supplementary Planning Guidance, and where possible the Mayor's best practice standards.
- **Climate change mitigation:** further information regarding cooling is required, and in order to verify the energy efficiency savings given from energy efficiency measures alone, the applicant should provide sample TER and DER output sheets. A drawing demonstrating the route of the heat-network linking all blocks, in addition to the floor area and location of the energy centre, should be provided, together with a plan of the photovoltaic array. Finally, given the carbon dioxide emissions savings fall short of the target set out in London Plan Policy 5.2, the applicant should review the strategy to identify additional measures.

- **Blue Ribbon Network and flooding:** in accordance with London Plan Policy 5.12, the applicant should ensure that issues regarding flood risk are appropriately addressed and mitigated.
- **Transport:** electric vehicle charging points, a construction logistics plan, and delivery and servicing plan should be secured by condition. The travel plan, Controlled Parking Zone exclusion, car club incentives and Thames Pathway signage should be secured through the section 106 agreement.

for further information, contact GLA Planning Unit (Development & Projects team):

Colin Wilson, Senior Manager – Development & Projects

020 7983 4783 email colin.wilson@london.gov.uk

Justin Carr, Strategic Planning Manager (Development Decisions)

020 7983 4895 email justin.carr@london.gov.uk

Sarah Considine, Principal Strategic Planner, case officer

020 7983 5751 email sarah.considine@london.gov.uk
