

Planning Department  
London Borough of Richmond upon Thames  
Civic Centre  
44 York Street  
Twickenham  
TW1 3BZ

Ref: JL/PB/265

**BY E-MAIL**

1 July 2016

Dear Sir or Madam,

**RE: INFORMER HOUSE, 2 HIGH STREET, TEDDINGTON, TW11 8EW**  
**FP APPLICATION: AFFORDABLE HOUSING SCHEME**  
**SUPPORTING PLANNING INFORMATION**

This letter – supporting planning information, is submitted to the London Borough of Richmond upon Thames (hereafter referred to as the ‘Council’), on behalf of Richmond Housing Partnership (hereafter referred to as the ‘RHP’), in support of a proposal for affordable ‘shared ownership’ housing at Informer House, 2 High Street, Teddington, TW11 8EW (hereafter referred to as the ‘Site’).

This Full Planning Application (hereafter referred to as the ‘Amended Application’) seeks consent from the Council for the:

*“Demolition of the existing office (B1a) building (395 sq.m) and the erection a part six / five-storey mixed-use building with a ground floor office / commercial unit (300 sq.m) and 23 (12 x 1 and 11 x 2 bed) affordable ‘shared ownership’ apartments above with 10 car parking provided at basement level including associated works.”*

What we are proposing is a mixed-use scheme with the opportunity to bring forward:

- A unique ‘landmark’ scheme for affordable residential units in the London Borough with exemplar design
- A useable ground floor commercial unit, which would enhance and improve Teddington Town Centre, and assist in bridging the gap between the shopping areas of High Street and Broad Street
- Public realm improvements

Detailed and comprehensive Pre-Application Consultation discussions were undertaken with the Council (Housing, Planning and Planning Policy, Transport, and Design and Conservation Departments) who ‘in principle’ support the proposal. Public Consultation has also taken place with local residents including the Teddington Residents Association, key stakeholders and Local Councillors.

The Freeholder is currently offering the opportunity for redevelopment for affordable homes exclusively to RHP. However, should the Application not be successful, the Freeholder will implement the prior approval consent approval (Application Number: 14/2683/P3JPA) and convert the existing building to eight residential units.

The contents of this letter are set out as follows:

1. Proposed Development and Scheme Evolution (Page 3)
2. Background and Objectives (Page 6)
3. Site Details (Page 7)
4. Main Planning Issues (Page 12)
5. Relevant Planning Policy (Page 12)
6. Planning Considerations (Page 15)
7. Conclusions (Page 35)

## Full Planning Application Package

This document provides a brief summary on the Site and surrounding area, the proposals, and key planning policies and planning considerations, and should be read in conjunction with the following supporting documents (in no particular order):

- Completed Pre-Application Form prepared by JLA Limited
- Design and Access Statement prepared by Wimshurst Pelleriti
- Drawings / Plans prepared by Wimshurst Pelleriti

### Existing

- WP-0410-EX-E-East (East Elevation)
- WP-0410-EX-E-North (North Elevation)
- WP-0410-EX-E-South (South Elevation)
- WP-0410-EX-E-West (West Elevation)
- WP-0410-EX-P-L0 (Ground Floor Plan)
- WP-0410-EX-P-L1 (First Floor Plan)
- WP-0410-EX-P-LB (Basement Floor Plan)
- WP-0410-EX-P-LR (Roof Plan)
- WP-0410-EX-S-BB (Section BB)
- WP-0410-GA-E-East (East Elevation)
- WP-0410-GA-E-North (North Elevation)
- WP-0410-GA-E-South (South Elevation)
- WP-0410-GA-E-West (West Elevation)
- WP-0410-GA-P-All (Multi Floor Plan)
- WP-0410-GA-P-L0 (Ground Floor Plan)
- WP-0410-GA-P-L1-2 (First and Second Floor Plan)
- WP-0410-GA-P-L3-4 (Third and Fourth Floor Plan)
- WP-0410-GA-P-L5 (Fifth Floor Plan)
- WP-0410-GA-P-LB (Lower Ground Floor Plan)
- WP-0410-GA-P-LR (Roof Plan)
- WP-0410-GA-S-AA (Section AA)
- WP-0410-P-500 (Site Location Plan)
- WP-0410-P-1250 (Site Location Plan)

### Proposed

- WP-0410-E-ST-TT (Street Elevation)
- WP-0410-E-ST-XX (Street Elevation)
- WP-0410-E-ST-YY (Street Elevation)
- Heritage Statement prepared by Heritage collective
- Daylight, Sunlight and Overshadowing Report prepared by Syntegra Consulting
- Internal Daylight Report prepared by Syntegra Consulting
- Transport Statement prepared by Kronen Limited
- Air Quality Assessment prepared by Peter Brett Associates
- Construction Management Plan prepared by F3 Group
- Energy Strategy Report including completed Sustainable Construction Checklist prepared by Syntegra Consulting
- Flood Risk Assessment and Surface Drainage Strategy prepared by RPS Group
- Landscape Character and Visual Impact Assessment prepared by Allen Pyke Associates
- Phase 1 Environmental Risk (Contamination) Assessment prepared by RPS Group

- Strategic Property Report prepared by Snellers Commercial
- Viability Statement prepared by the RHP
- Noise Impact Assessment prepared by Peter Brett Associates

Please find attached cheque, in the sum of £8,855.00 (inclusive of VAT), made payable to the London Borough of Richmond upon Thames, in respect of the Application.

## 1. PROPOSED DEVELOPMENT & SCHEME EVOLUTION

Please refer to the supporting Design Statement and Drawings / Plans prepared by Wimshurst Pelleriti.

### i. Proposed Development

This Application seeks consent from the Council for the:

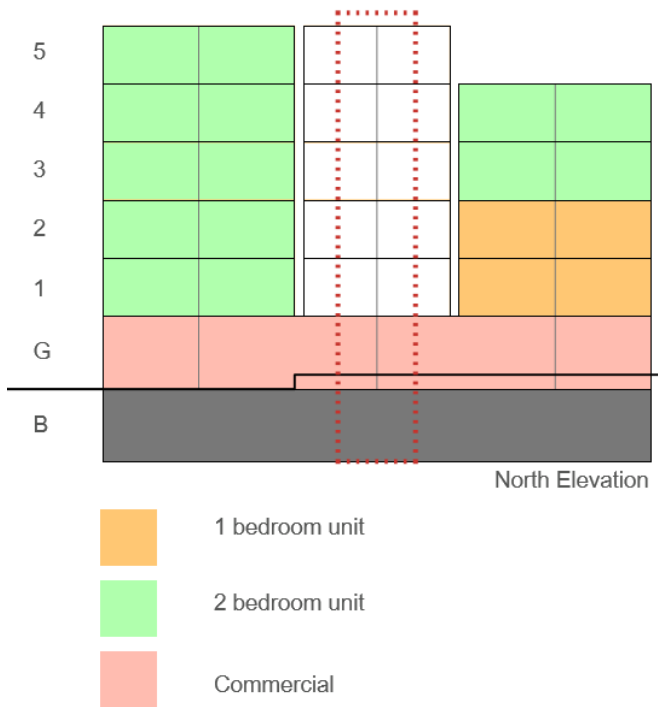
*“Demolition of the existing office (B1a) building (395 sq.m) and the erection a part six / five-storey mixed-use building with a ground floor office / commercial unit (300 sq.m) and 23 (12 x 1 and 11 x 2 bed) affordable ‘shared ownership’ apartments above with 10 car parking provided at basement level including associated works.”*

#### CGI – Impression from Waldegrave Road



## Mix & Viability

The proposed new building will accommodate office/commercial use across the whole of the ground floor with 23 affordable apartments above and car parking and cycle storage at the lower ground level.



Floor	No. of Units	1 Bed Units	2 Bed Units
5th Floor	3	2	1
4th Floor	5	2	3
3rd Floor	5	2	3
2nd Floor	5	3	2 (1 WAU)
1st Floor	5	3	2 (1 WAU)
Ground	-		
Basement	-		
<b>Total</b>	<b>23</b>	<b>12</b>	<b>11</b>

Floor	Space	Amount/Area
<b>Ground</b>	Commercial	300 sqm.
<b>Basement</b>	Cycles	40 + 6 (Commercial)
	Car Parking Spaces	10
	Refuse	4x660L (commercial) 5x1260L (Resi.)
	Plant	

Dwelling type	No. of Units	Area (sqm)
1 Bed	12	51-55
2 Bed	9	61-65
2 Bed (WAU)	2	77
<b>Total</b>	<b>23</b>	

## Unit Mix

Two Wheelchair Units are located at first and second floor whilst the remaining mix of one and two beds all meeting Greater London Authority (GLA) space standards at above 50/61msq respectively.

A typical floor accommodates 2 x 50sqm 1b/2p flats and 3 x (av.) 64sqm 2b/3p flats all with external balconies. All flats are designed to meet part M4(2) of building regulations that replaced Lifetime homes.

The building can be accessed from both ground and lower ground. The main entrance from the high street provides a lift lobby and stair core that accesses all floors of the building.

## Car & Cycle Provision

On site provision has been made for 10 parking spaces at lower ground level matching the existing provision two of which are proposed as 'co-wheels' spaces. In addition to on-site parking Zip Car and other car share sites operate in the area.

Cycle provision is twofold. At lower ground level a secured store for residential / commercial bike storage provides 40 spaces using a two tier bike rack for residents and six separate spaces for commercial. In addition to this, Sheffield stands provide 'short stay' streetside parking for customers / visitors.



## Materials

The proposal uses a light stock brick that compliments the traditional fabric of Teddington. The use of a lighter brick helps the scheme feel soft and significantly reduces its visual mass. Its tone helps mediate between the ad-hoc nature of the surrounding buildings creating a coherent mass.

### CGI – Impression from Broad Street



## ii. Scheme Evolution

### Pre-Application Consultation

A Request for Pre-Application Consultation was made via e-mail dated 16 November 2015 with a meeting taking place on 20 December 2015. Additional information was submitted via e-mails dated 22 December 2015 and 10 March 2016 regarding design alterations and marketing followed by a further meeting with the Council on 12 April 2016.

### Public Consultation

Public consultation was undertaken on the 27 and 28 of April 2016 (between 4.30pm to 7.30pm) at Richmond Housing Partnership HQ. Leaflets were distributed throughout the local area including Local Councillors, residents and commercial properties. A number of local residents attended in which transport and design issues were raised with comments incorporated into the submitted scheme.

## Public Exhibition Board



Teddington Residents Association were approached, via e-mails dated 14 April 2016 and 26 April 2016, to meet and attend the Public Consultation. To date, no response has been received.

It is considered that the Application, as now submitted, addresses all the issues raised by the Council that are assessed in full in Section 6.0 of this document.

## 2. BACKGROUND & OBJECTIVES

### i. Background (About RHP)

RHP is a Registered Provider of social housing who are committed to providing high levels of customer satisfaction and providing new high quality homes to meet local housing need.

Web link:

<https://www.rhp.org.uk/rhpui/>

## ii. Objectives

A housing business with a strong social purpose, RHP provide decent quality affordable homes to people unable to rent or buy in the local private housing market. Formed in 2000, RHP owns or manages around 10,000 homes across South West London. As part of its five year strategy, RHP is working towards providing 500 more affordable homes for local people by 2018.

## 3. SITE DETAILS

Please refer to the supporting Design and Access Statement prepared by Wimshurst Pelleriti.

### i. Description

The Site is occupied by an early 1980s two-storey office building with an undercroft for cars at the basement level, accessed off Enterprise Way. The north side of the building faces onto High Street as it passes over the railway line.

#### Accommodation Schedule

Floor	Floorspace	
	sqft	sqm
Lower Ground Floor	146	13.6
Ground Floor	2042	189.7
First Floor	2061	191.5
Total	4249	394.8

Source: Snellers Marketing Brochure

#### Site Photographs



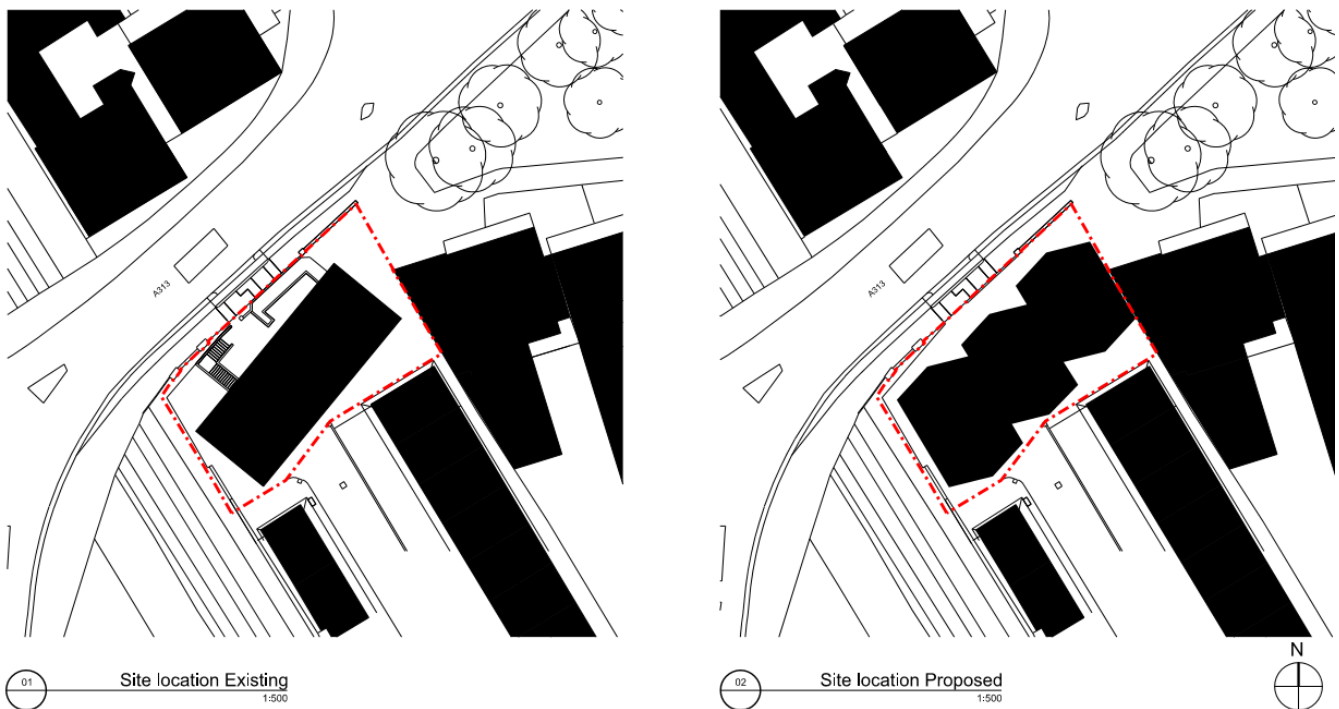
The Site is bounded on the North side by the High Street, on the West by the train line and on the east by a significant five-seven-storey hotel / commercial building.

Due to the bridge over the railway the Site can be accessed on two levels as discussed previously.

The Site has ten parking spaces at lower ground floor level in the building's undercroft area. The building's refuse store is in the undercroft area and is collected from Enterprise Way. The office building's waste is collected three times a week.



Dwg No. WP-0410-P-500 (Site Location Plan)



## ii. Context

The site is in Teddington 'District' Town Centre.

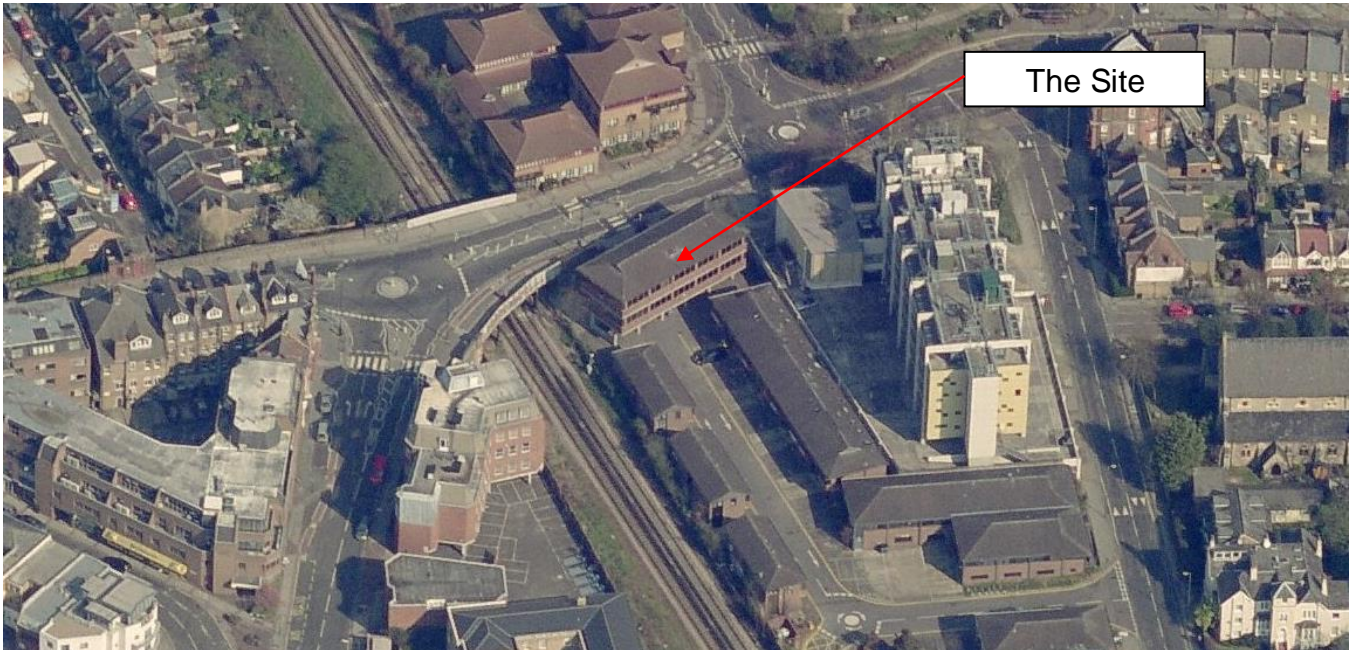
The Site lies adjacent to the Teddington High Street Conservation Area (to the north) and an area of Other Landscape of Townscape Interest lies to the east (corner of Station Road and the High Street).

At its western end the conservation area boundary includes the northern part of High Street, opposite the Site which sits outside the boundary, along with the Travelodge hotel directly east of the Site (No.2 Station Road). As the road rises upward from the east the character of the buildings changes from the tight knit Edwardian High Street to much later 20th century development of a larger scale. The form and influence of this development is softened by the trees and small open space north of High Street in front of Elmfield House, a Grade II Listed building, north-east of the Site. The open green space on the south side of High Street also serves to distance between the historic street scape and the later development at No.2 Station Road.

Directly north of the Site the buildings are similar in style to those on the Site, being brick, with brown tile roofs, but are three storey and more prominent in views from the conservation area due to the bend in the road. Within this small area at the western end of the conservation area Harlequin House is a six / seven-storey building set back from the north side of the road and the Travelodge is a six-storey building to the south (outside the conservation area).



## Aerial Photograph of the Site & Surrounding Area



## **Heritage Assets**

Please refer to the supporting Heritage Statement prepared by Heritage Collective.

Although not within a conservation area the Site is close to the west end of High Street (Teddington) Conservation Area and Park Road (Teddington) Conservation Area is located a short distance south of the Site.

## **Transport & Accessibility**

Please refer to the supporting Transport Statement prepared by Kronen Limited.

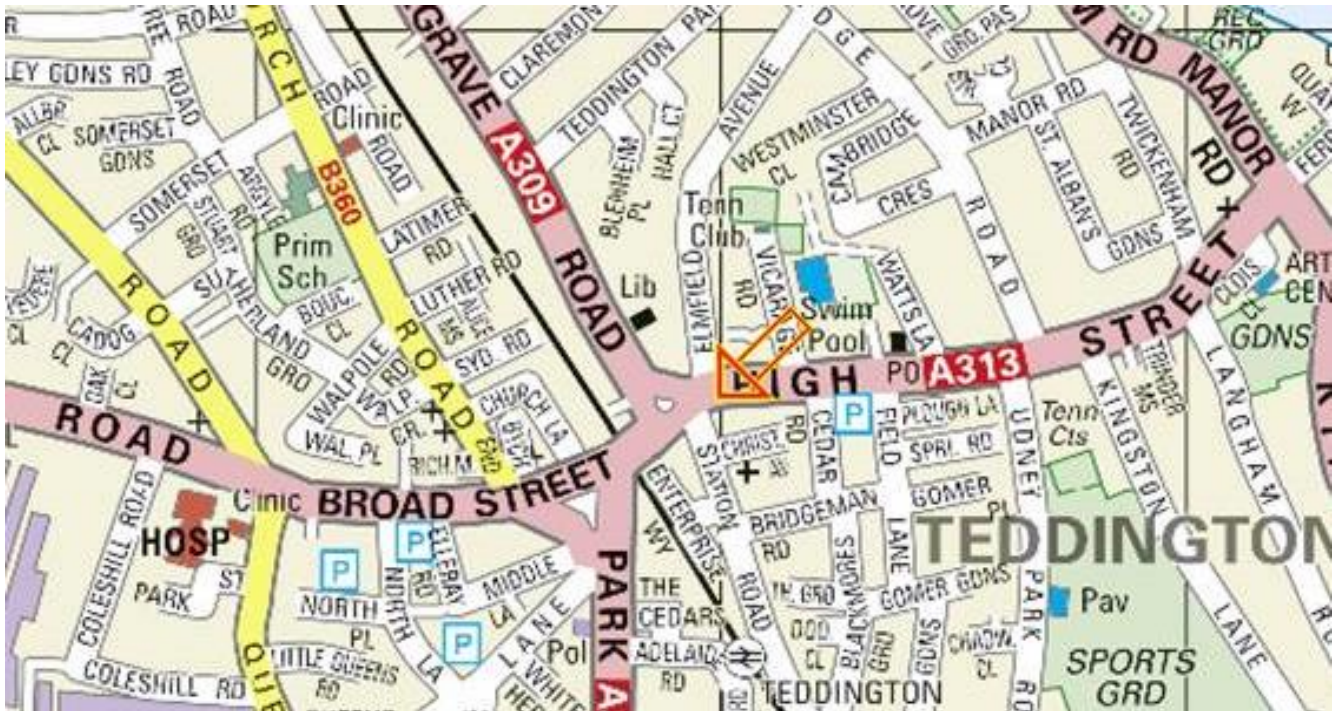
The Site is accessed by The A313 High Street via Station Road and Enterprise Way. The A313 High Street is a primary / distributor road and Station Road is an unclassified local access road.

The Site has access to six bus services as follows: 33, 281, 285, 481, R68, and X26. The site is also approximately 300 metres walking distance from Teddington Railway Station via Station Road.

The Site is located in LB Richmond's Controlled Parking Zone Teddington 'T'. Restrictions within this CPZ operate Monday to Friday between 8.30am to 10.30am.

There are three Zipcar car club cars within a short walk distance to the site and eight Zipcar cars within one mile distance of the Site.

Street Map



The Public Transport Accessibility Level (PTAL) is a simple, easily calculated approach that hinges on the distance from any point to the nearest public transport stop, and service frequency at those stops. The result is a grade from 1–6 (including sub-divisions 1a, 1b, 6a and 6b), where a PTAL of 1a indicates extremely poor access to the location by public transport, and a PTAL of 6b indicates excellent access by public transport.

WebCAT – Transport for London

Access level (PTAL) Time mapping (TIM)

PTAL: a measure which rates locations by distance from frequent public transport services.

**Map key - PTAL**

0 (Worst)	1a
1b	2
3	4
5	6a
6b (Best)	

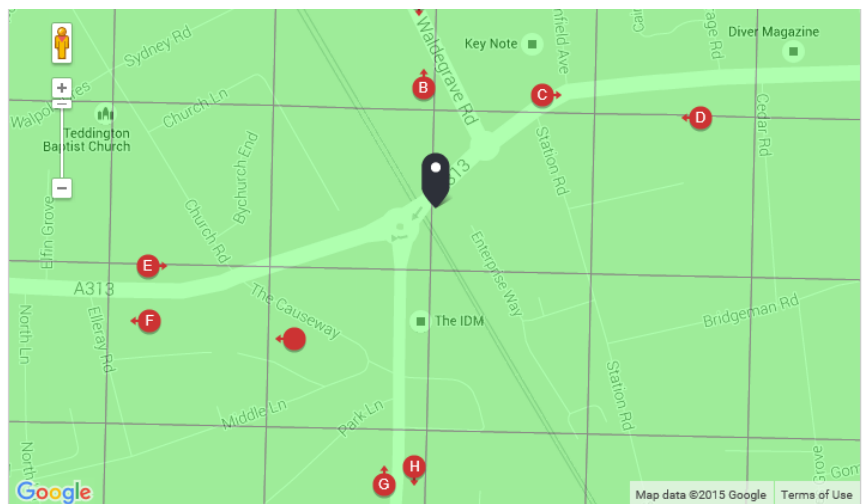
**Map layers**

- PTAL (cell size: 100m)

**Scenario**

2011 (Base year)

Update



You can click anywhere on the map to change the selected location.

PTAL output for 2011 (Base year)  
 3



## **Flooding Risk**

Please refer to the supporting Flood Risk Assessment and Surface Drainage Strategy prepared by RPS Group.

The Site is located within the Environment Agency's Flood Zone 1, at low risk of flooding from fluvial and tidal sources. As such, there will be no adverse impact in terms of flooding as a result of the proposed change of use to residential. No external alterations are proposed and no changes are proposed to the cutilage of the building on the Site (for example no additional hardstanding is proposed).

The Site is located within the Teddington Critical Drainage Area (CDA).

## **Air Quality**

Please refer to the supporting Air Quality Assessment prepared by Peter Brett Associates.

A whole borough Air Quality Management Area (AQMA) has been declared in Richmond upon Thames due to exceedences of the annual and hourly mean NO<sub>2</sub> and the 24-hr mean for PM<sub>10</sub> objectives.

## **Contamination**

Please refer to the supporting Phase 1 Contamination Assessment prepared by RPS Group.

Historically the Site comprised predominantly undeveloped land between 1864 and c.1896. By c.1896 railway tracks were present in the south and west of the Site, with the majority of the remainder of the Site also likely associated with the railways. By c.1959 the Site appeared to comprise part of a yard area associated with the railways to the west. The railway tracks in the south and west of the Site were no longer present by c.1978. The current premises on site had been constructed by c.1989.

Former significant land uses identified in the surrounding area include a Railway adjacent to the south and west since 1864, a Smithy located 25m to the southwest (1896 – c.1915), a Garage situated 30m to the south (1959 – c.1986) and a Works located 60m to the south (1983 – c.2010).

### iii. Planning History

A planning history search of the Site has been undertaken by making use of the online property search engine on the Council's website.

Application Number	Status	Proposal
14/2683/P3JPA	Prior Approval Approved 21/08/2014	Change of use of office building (B1) to 8 residential flats (4 x 1 bed and 4 x 2 bed).
12/1301/DD01	granted permission 28/11/2012	Details pursuant to condition LT09 - hard/soft landscaping
12/1301/FUL	granted permission 20/06/2012	Alterations to front external area and boundary including new hard/soft landscaping and boundary ra...
84/1069	granted permission 08/11/1984	Erection of balustrade to replace parts of existing brick wall.

## 4. MAIN PLANNING ISSUES

It is considered that the main planning issues are:

- Loss of employment
- Mixed-use credentials
- Need for 'affordable' housing
- Design quality (bulk, scale and mass)
- Impact upon the adjoining properties and the surrounding area
- Transport and movement

## 5. RELEVANT PLANNING POLICY

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that, when determining a planning application, regard is to be given to the Development Plan, and the determination shall be made in accordance with the plan unless material considerations indicate otherwise.

### i. Development Plan

Greater London Authority (Published)

- The London Plan: Spatial Development Strategy for Greater London (July 2011) including Alterations (March 2015)



London Borough of Richmond upon Thames (Adopted)

- Local Development Framework: Core Strategy Development Plan Document (April 2009) – CP1 (Sustainable Development; CP2 Reducing Carbon Emissions; CP3 Climate change – Adapting to the Effects; CP5 Sustainable Travel; CP7 Maintaining and Improving the Local Environment; CP8 Town and Local Centres; CP14 Housing; CP15 Affordable Housing; CP16 Local Services/Infrastructure; CP19 Local Business
- Local Development Framework: Development Management Plan Development Plan Document (November 2011); DM SD 1 Sustainable Construction; DM SD 2 Renewable Energy and Decentralised Energy Networks; DM SD 4 Adapting to Higher Temperatures and Need for Cooling; DM SD 5 Living Roofs; DM SD 7 Sustainable Drainage; DM SD 10 Water and Sewerage Provision; DM OS 6 Public Open Space; DM TC 1 Larger Town Centres; DM TC 3 Retail Frontages; DM HD 1 Conservation Areas - designation, protection and enhancement; DM HD 2 Conservation of Listed Buildings and Scheduled Ancient Monuments; Policy DM HD 4 Archaeological Sites; DM HO 2 Infill Development; DM HO 4 Housing Mix and Standards; Delivering Affordable Housing; DM EM 1 Development for Offices, Industrial, Storage and Distribution uses; DM EM 2 Retention of Employment; DM TP 1 Matching Development to Transport Capacity; DM TP 2 Transport and New Development; DM TP 3 Enhancing Transport Links; DM TP 6 Walking and the Pedestrian Environment; DM TP 7 Cycling; DM TP 8 Off Street Parking - Retention and New Provision; DM DC 1 Design Quality; DM DC 2 Layout and Design of Mixed Use Schemes; DM DC 3 Taller Buildings; DM DC 4 Trees and Landscape; DM DC 5 Neighbourliness, Sunlighting and Daylighting; DM DC 6 Balconies and Upper Floor Terraces; DM DC 7 Shop fronts and shop signs; DM DC 9 Planning Application Checklist
- Online Proposals Map (July 2013)



Key:



Town Centre Boundary



Primary or Secondary Road

## ii. Emerging Development Plan

The Council have commenced the process of reviewing our existing planning policies within the adopted Core Strategy (2009) and Development Management Plan (2011) as well as considering the allocation of key sites for development. A preliminary public consultation on the rationale and scope for the review of the existing policies, together with the proposed sites to be allocated for development, took place between 4 January 2016 and 1 February 2016.

Activity	Date
Consultation on scope of review of policies and draft site allocations	January to 1 February 2016
First consultation on the draft Local Plan (Pre-publication)	Early summer 2016
Second consultation on the draft Local Plan (Publication) that the Council intends to submit to Secretary of State	Late autumn 2016
Submission of the draft Local Plan to the Secretary of State	Spring/summer 2017
Independent Examination in Public	Autumn/winter 2017/2018
Adoption of the Local Plan	Spring 2018

## iii. Supplementary Planning Guidance (SPG) & Documents (SPDs) / Evidence

### London Borough of Richmond upon Thames (Adopted)

- Affordable Housing SPD
- Design Quality SPD
- Front Garden and other Off-Street Parking Standards SPD
- Planning Obligations (in conjunction with Borough CIL) SPD
- Refuse and Recycling Storage Requirements SPD
- Residential Development Standards SPD and Housing Optional Technical Standards update
- Small and Medium Housing Sites SPD
- Sustainable Construction Checklist SPD
- Conservation Areas SPGF
- Contaminated Land SPG
- Design for maximum access SPG and Housing Optional Technical Standards update
- Security by Design SPG
- Trees: Landscape Design, Planting & Care SPG
- Authority's Monitoring Reports
- Basement Developments - Review of Planning Implications
- Borough-wide Sustainable Urban Development Study
- Climate Change Strategy
- Employment Land Study
- Employment Sites and Premises
- Evidence Base for Carbon Emissions Reduction Policies
- Housing land supply
- Housing needs assessment
- New Housing Survey
- Town Centre Retail Research

## iv. National Planning Policy Guidance

### Department for Communities & Local Government (Published)

- National Planning Policy Framework (March 2012)

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## 6. PLANNING CONSIDERATIONS

The following section contains an assessment of the development proposals against the planning policies outlined above.

### i. Case for Demolition

We consider that the circumstances of this case, particularly the residential and community benefits that would accrue from the value to be derived from the proposed development could in any event be seen as overriding.

### ii. Principle of Development (Land Use)

#### Loss of Office (B1a) Floorspace

The scheme proposes 300 square metres (m<sup>2</sup>) commercial floorspace in the new building resulting in the loss of circa. 95m<sup>2</sup>.

#### Marketing Evidence

Please refer to the Strategic Property Report prepared by Snellers Commercial.

Snellers Commercial (based in Teddington) are the commercial agents, who originally marketed the Site in August 2014 resulted in six viewings and four subsequent offers within a month all from developers looking to enact the permitted development (office to residential), and have been instructed to provide a market assessment of the Site. From a planning perspective, the existing building, being small and cellular with limited car parking and IT cabling possibilities makes it unappealing in the current hi-tech age. Due to the entrance configuration, there is no practical way to let the top floor separately to the ground floor.

Details of how the existing building is occupied:

- The ground level is occupied and used as office
- The first floor is unoccupied - it is used mainly as storage together with lavatories and a meeting room
- The lower ground floor has a services room
- The current premises employ 14 employees. The proposal will provide open plan commercial floorspace with the latest infrastructure thereby improving its value as commercial floorspace in the locality
- Fundamentally, substantial investment would be required to make a number of necessary alterations to the building. The building has issues with the glazing, heating system and roofing. Of note:
  - Many of the windows are unable to open for ventilation. Others are unable to fully shut with a seal
  - Many double glazings seals have failed
  - The heating system does not allow any individual room control (the piping is set into concrete)
  - The roof has issues with guttering, ridge tiles, slipping tiles and failing underliner
- Financial contributions from development for local employment training and skills development would be used.

While the Site provides cost effective business accommodation to occupiers requiring space, it is clear that this will only ever provide cost effective accommodation, rather than commanding premium rental levels.

As a result, the income derived from the various occupancies on-site, is less than it might be, if the premises matched the market requirements.

In order to improve both the level of rental income and its certainty, considerable capital expenditure would be required. Refurbishment and redesign of the office accommodation would be required, to provide high quality / environmentally considerate accommodation, capable of use by modern businesses, as this is where the market demand lies.

Even if this were the case however, it is highly unlikely that the investment would create a suitable return, as the likely void period and marketing period would be considerable and this action would not overcome the fundamental difficulties, intrinsic to this Site, which are that the location is unsuited to the provision of office accommodation to the modern occupier. The return on this expenditure would be extremely small and its recovery would take some considerable time. This being the case, it is unlikely that suitable and cost effective sources of investment could be obtained on the commercial lending market.

In order for the Site to survive in the increasingly competitive and challenging market conditions, the strategy is to develop smaller more affordable space, in a more appropriate location.

### **Alternative Marketing Evidence**

We are also mindful that Paragraph 5.3.10 in support Development Management Plan DOD Policy DM EM states there may be some instances where other appropriate evidence relating to a particular employment site or premises will be considered by the Council (instead of marketing evidence). In this regard we wish consideration to be given to:

- Prior approval has already been gained for 8 residential units (14/2683/P3JPA) and this will be implemented if this alternative scheme is not approved
- The proposal is for a 100% affordable 'shared ownership' housing scheme with a Registered Social Landlord (RHP) The Council's Housing Department support the proposal

The stance on office conversion to residential under permitted development is, of course, different with every Local Planning Authority, but we would hope the Council would adopt a pragmatic approach and attach weight to the fall-back position of what could be done through prior approval. What we are proposing is a mixed-use scheme with the opportunity to bring forward:

- A unique 'landmark' scheme for affordable residential units in the London Borough with exemplar design
- A useable ground floor commercial unit, which would enhance and improve Teddington Town Centre, and assist in bridging the gap between the shopping areas of High Street and Broad Street
- Public realm improvements



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## Affordable Housing Need (Shared Ownership)

Section 6 of the National Planning Policy Framework places an emphasis on boosting 'significantly' the supply of housing. The London Plan recognises the pressing need to increase the supply of housing across the city and promotes developments in well-connected, urban areas which contribute to the city's housing stock.

Different types of accommodation are recognised as important in the London Borough, particularly to provide affordable options and meet the needs of residents who may otherwise have difficulty finding alternative accommodation. These types of accommodation generally need to be protected and encouraged given the constraints of land supply and affordability issues in the borough. The limited land supply means that new developments must be directed at identified local needs.

Although there may not currently be a specific need within the London Borough, the range of housing to meet specific community needs can include sheltered housing with care support, staffed hostels, residential care homes / nursing homes, extra-care housing, provision by local colleges, hotels and other institutions for their students and / or staff. These include supported housing provision for children, older persons and other client groups. Each may have specific local needs and their requirements need to be recognised.

Current housing priorities include:

- Remodelling of older peoples sheltered accommodation to provide self-contained units.
- Extra care housing which in some cases can be created from remodelling existing sheltered accommodation
- Private sheltered and extra care accommodation (but this would be a lower priority than affordable housing)
- Supporting the PLD valuing people agenda to provide greater choice in supported housing options
- Student accommodation to meet needs of institutions within the borough.

The Council's Tenancy Strategy – 2013 states the Council and The Richmond Housing Partnership recently commissioned the Cambridge Centre for Housing and Planning Research at University of Cambridge to carry out an independent analysis of the private rented sector in Richmond upon Thames. The research found that the London Borough is an expensive area in which to rent privately with high quality housing, popular with wealthy households. Lettings agents are primarily focused on high end lets to households headed by people working in the City, young professionals and corporate lets.

Large areas of the London Borough including Teddington have exceptionally high rents, averaging rents of above £2,200 per month for a two bedroom property. Affordable Rents at 80% of market rents are clearly not affordable in these areas taking them outside of all Local Housing Allowance rates by a significant margin. These would then be unavailable to housing applicants claiming welfare benefits including the low waged, which comprises the majority of households on the Richmond Housing Register. The incomes required to fund these rent levels would be outside of the Borough's recent Allocation Policy (2012) levels.

In some areas of the London Borough rents are lower, such as Hampton North, Heathfield and Whitton. In these areas there may be more flexibility to charge higher rent levels up to 80% of market rents.

Research carried out by the Council found that affordability was particularly an issue for larger properties with issues around affordability for three bedroom Affordable Rent properties in 13 out of 18 wards in Richmond upon Thames.

Registered Providers must consider the atypical nature of the private rented sector within the London borough (which largely focuses on high income households) when setting rent levels for Affordable Rent properties.

The Council and The Richmond Housing Partnership commissioned DTZ to research the housing market in Richmond upon Thames, issues around housing need and supply and develop an evidence base to inform the Tenancy Strategy.

The proposed scheme will contribute 23 new residential units to the London Borough. While this only represents a high addition in the context of wider, long-term targets, it is considered that the level of accommodation provided will make a positive and important contribution to the overall housing stock in the Borough and, more widely, London. The level of provision assists the Council in achieving their annual housing targets dictated by the Mayor's London Plan.

Attached is a summary of scheme viability based on two different scenarios:

1. A policy compliant 80/20 split in terms of affordable rent and shared ownership housing
2. 100% shared ownership

It is clear from the summary of viability reports that the first scenario with 80% affordable rent and 20% shared ownership is not what RHP would regard as viable with a very high negative Net Present Value, despite RHP assuming Greater London Authority (GLA) grant funding and significant levels of internal subsidy. Whereas the 100% shared ownership led project is viable.

We would like to highlight that the 100% shared ownership scheme provides a total of 23 affordable homes, which is in fact greater than the policy requirement of 9 (40%), with 100% nominations in favour of the Council. Given that the scheme also includes a substantial commercial element to help protect local employment opportunities within the borough then this proposal is for an achievable scheme that RHP would be excited to deliver. The alternative is to deliver no affordable housing and leave the external of the existing office block.

### **iii. Mixed-Use Credentials – Residential & Commercial**

The proposal has been considered on its own merits and considered the follow factors:

- The amount of ground floor commercial floorspace
- Design quality
- Likely access, parking and traffic implications
- Compatibility with the policies for other land uses
- The type, size and tenure of residential provision which should be in accordance with policies and guidance

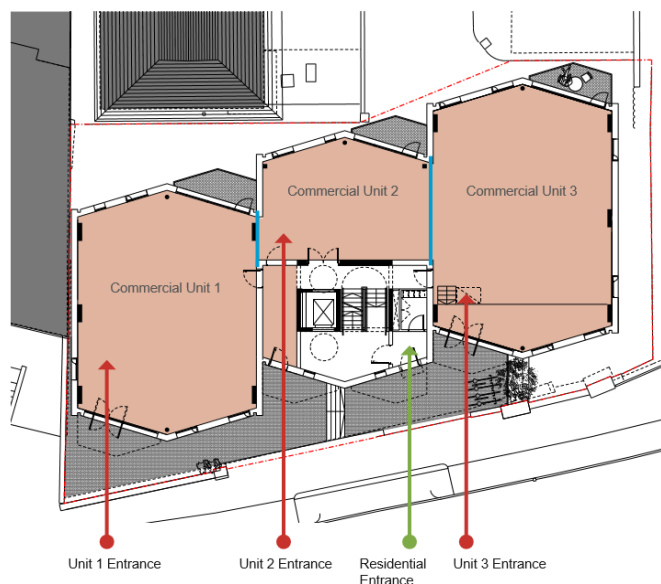
#### iv. Teddington 'District' Town Centre

Proposals that contribute towards a suitable mix of uses will be approved, provided that they are appropriate to the function, character and scale of the centre. Acceptable town centre uses could include retail (if within or well related to designated frontages), business, leisure, tourism, community uses, health and residential development compatible with other development in the town centre. The Council will protect and improve the provision of day-to-day goods and services in the local and neighbourhood centres of the borough.

The proposals:

- Will provide appropriate an office / commercial unit including residential that is appropriate, which serve the community or attract visitors
- Are of a scale that enhances the vibrancy and vitality of the centre and do not erode the core function of the centre, or another neighbouring centre or compromise an existing use. This will apply to all proposed uses
- Respect and enhance the heritage, character and local distinctiveness of the centre, whilst making the most efficient use of land
- Include overall improvements and enhancements of the small centres; or modernize outmoded premises. The development improves and maintains commercial provision in the smaller centres, without significantly expanding it
- Do not add disproportionately to pressure on parking

#### Entrances



Welcoming glazed ground floor units will enhance the streetscape. In addition, the building sets back from the site boundary offering an extension of the existing public realm that will provide a mix of soft and hard landscaping.

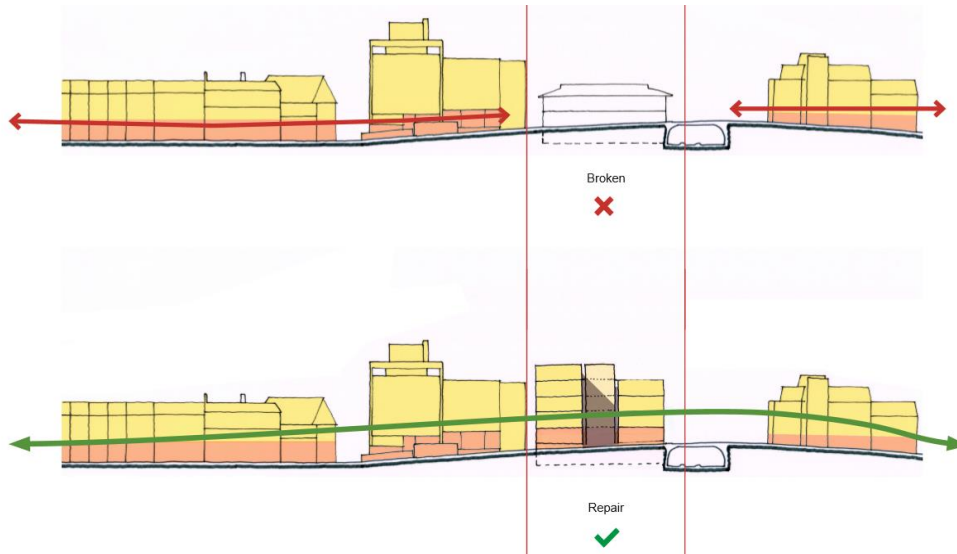
#### CGI – Impressions of Public Realm



## Public Realm

If one travels from the High Street towards Broad Street there is a distinct break in the public realm. The shops and public amenities such as benches terminate and only re-establishes beyond the bridge. A core concept of the scheme will seek to repair this urban fissure providing light welcoming commercial use at ground level activating the street scape whilst enhancing the transition between the existing public plaza next to Nando's and Travelodge. Broken.

### Repairing the Streetscape



## Active Frontage

As outlined earlier the scheme will significantly enhance the public realm by activating the ground plane.





## v. Housing Density

With regard to the Mayor's density matrix, the Site is considered to be 'urban' and in Public Transport Accessibility level Rating 3, which is regarded as moderate. In any event, density is often considered to be a crude calculation and greater emphasis should be placed on how 'comfortable' the scheme feels in its location from an urban design perspective.

This scheme embraces this approach, by integrating the proposed new development into the natural built and historic environment. This is shown through the proposals overall scale, density, massing, height, landscape, layout, materials and access, in relation to neighbouring buildings and the local area more generally.

### London Plan – Table 3.2: Sustainable Residential Quality Density Matrix (Habitable Rooms and Dwellings per Hectare)

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

The London Plan seeks the intensification of housing supply through high density development. Boroughs are encouraged to maximise housing density paying due regard to local context, design principles and public transport accessibility. The quantum and mix of residential development proposed is considered to be appropriate for the Site in terms of creating a mixed and sustainable community.

## vi. Design Quality (Tall Buildings)

Please refer to the supporting Design and Access Statement prepared by Wimshurst Pelleriti and Landscape Character and Visual Impact Assessment prepared by Allen Pyke Associates.

National planning policy guidance sets out the approach Local Planning Authorities are to take when determining whether to grant planning permission or other consents for a proposal that affects the significance of a heritage asset. The key to sound decision-making is the identification and understanding of the differing, and perhaps conflicting, heritage impacts accruing from the proposals and how they are to be weighed against both each other and any other material planning considerations that would arise as a result of the development proceeding.

Proposals for taller buildings (Development Management Plan Policy DM DC 3) need to:

- Be well designed and to make a positive contribution towards the skyline and the surrounding area
- Respect, preserve and enhance the borough's heritage assets, their significance and wider historic environment including The Royal Botanic Gardens Kew World Heritage Site, Listed Buildings, Registered Parks and Gardens, Conservation Areas, Buildings of Townscape Merit, their settings and views of local and strategic importance, including the view from Richmond Hill
- Respect the local context and character and to be designed in a way that relates to the scale, height, mass, urban pattern and grain, materials, streetscape, open spaces and built form of an area, and the wider townscape, riverscape and landscape, including the impact on parking
- Respect the amenity and privacy of nearby residential areas, including microclimate and overshadowing
- Demonstrate a high level commitment to sustainable design and construction include a mix of uses, including functions that are accessible to the public, particularly at ground floor level (such as restaurants), in order to ensure successful integration into the surrounding area
- Include safe, attractive, comfortable and accessible amenity/open spaces designed to support social interaction and engender a sense of place
- Buildings will require a full design justification based on a thorough townscape appraisal and historic area assessment, and will be evaluated using the criteria for evaluation identified in CABE/ English Heritage Guidance 2007 and local guidance.

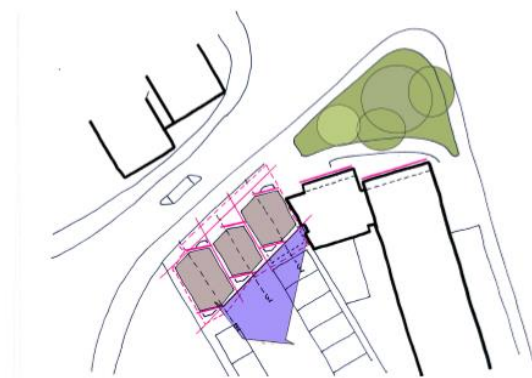
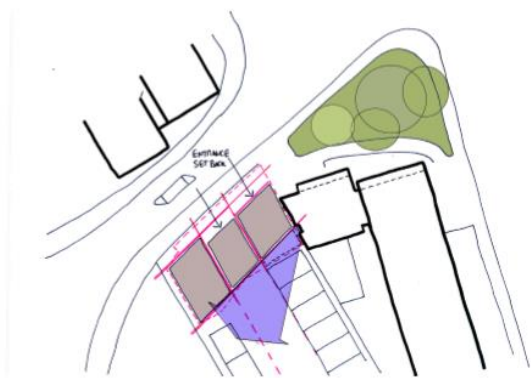
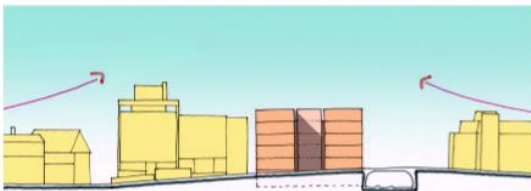
Council policy (Development Management Plan Policy DM DC 1) is intended to encourage site specific design responses, for both building and landscape proposals, (including alterations and extensions) not to restrict design freedom. The Council does not wish to encourage a particular architectural style or approach but expects each scheme to be justified as a result of a sound understanding of the site and its context.

It should be acknowledged that the physical character and amount of development has changed the area in recent years through the driving force of regeneration. This investment has produced an attractive environment, none of which was possible in the area's historic heyday. This is an important point as the character of the area, while having important historic references, is not a re-creation of those earlier times.

The scheme has been designed in three modules, with a setback central entrance to provide legibility from the road side. A series of 3D street views (within the supporting Design and Access Statement prepared by Wimshurst Pelleriti) have been to show the massing of the proposed development in the existing context. These views serve to demonstrate the locations from where the building will be most visible and are not the views of most importance with regard to the heritage significance of the buildings.

Matters relating to heritage, amenity impact etc. are addressed in the subsequent sections below.

### Concept Design – Key Ideas



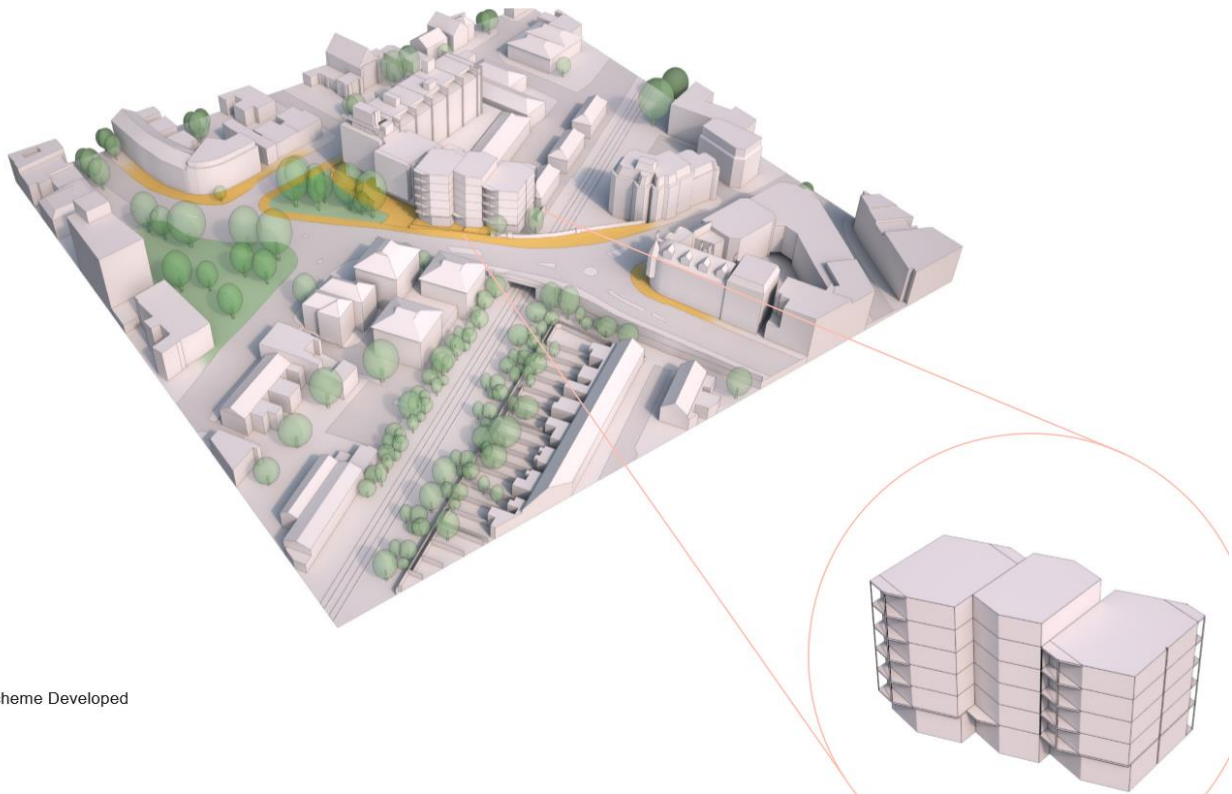
### **Potential effect on Landscape Character**

Effects on the character area of Junction of High Street, Broad Street and Park Road are restricted by the enclosure of the proposed development with the surrounding tall buildings, the tight urban grain of the town centre and surrounding residential streets and intervening vegetation. Effects will be greater during construction, but will reduce once the Site is operational. Initially these effects will be Adverse due to the nature of construction, but once operational the effect will be Neutral and Beneficial as the proposed new building will respond to its context, with its architecture, scale, massing, and materials complementing the adjacent character areas and contributing positivity to the town centre.

Effects on the character areas of Strawberry Hill and Teddington East LCA will be Minor / Moderate and Neutral once the site is operational as the proposed development integrates into the pattern and activity of the town centre. Effects will only be temporarily Adverse during construction and will only be experienced as a Minor element with the larger character area.

Effects on the Site will be Substantial because of the High magnitude of change, but they will be Neutral to Beneficial once operational as the proposed development assimilates into the adjacent buildings.

## Massing Iterations



Scheme Developed

## **Potential effect on Visual Amenity**

The Site is well contained by a combination of topography, vegetation and existing built form. The Site and its proposed building which will occupy the footprint of the current building is located in an area of high density taller buildings which limits its visibility from distant views.

Views are possible from the surrounding streets however these are partial and glimpsed views between the existing built forms of the town centre and are also filtered by intervening vegetation. The new building will be taller than the current building but it will be of a comparable height to its immediate neighbours and any views toward it are seen in this context of the town centre with its taller commercial buildings.

Views from residential roads footpaths and properties are considered sensitive receptors and it is recognised that during construction, with the associated plant and infrastructure, that the temporary effects will be of an Adverse nature. However once the Site is operational through the considered design of the architecture and landscape proposals to the public realm and the site boundaries, the effects will be either Neutral or Beneficial as the new development will make a positive contribution to views and amenity within the town centre.



## Conclusion

The Sites location and the resulting limited and confined number of Visual Receptors limit any effects of the development to a localised area within the town centre. The demolition and construction activity to facilitate and build the development will initially have a Moderate to Substantial effect on the immediate landscape character and visual amenity, however on completion, the scheme will have a Minor to Moderate and Neutral to Beneficial change as the proposed development will very quickly assimilate into the surrounding context and settlement pattern.

## Materials

Materials proposed are in keeping with the surrounding area. A light yellow stock brick will provide the primary material with the punctuation of the facades with metal balconies and window reveals, in steel and aluminium (painted a bronze colour). The elevation of the building is specifically designed with modulation and texture in mind to break up the mass of the building, creating shadows for windows and against the corners of the angled facade elements. The footprint of the building, which steps in and out along its frontage and rear elevations, allows the mass to be reduced in views from the surrounding area, adds variety to the street scene and provides visual interest.

## vii. Heritage Assets

Please refer to the supporting Heritage Statement prepared by Heritage Collective.

It is proposed to redevelop the Site with a new multi-storey building comprise of affordable residential apartments from ground floor upwards and commercial use at ground floor. The basement level will provide car parking as it does now.

No harm will arise from the demolition of the existing building due to its lack of architectural or historic interest. It makes no contribution to the historic built environment and no contribution to any listed buildings and their setting and its demolition should be acceptable.

Replacing it with a higher quality piece of architecture provides the opportunity to enhance the Site, its contribution to the rather bland townscape of the area and its presence at the centre of Teddington. Its context of modern buildings between three and six-storeys enables the possibility of a well-designed building of multiple stories to sit comfortably within the Site.

A building of the proposed bulk and height will bring about a change to the setting of the High Street Conservation Area. This change will be experienced when standing within the western end of the area and on approach to it from the west. The building will sit beside and be visible in the same views as the existing modern building at No.2 Station Road, as demonstrated by the viewpoint from the southern end of Waldegrave Road. This view does not contribute to the heritage significance of the conservation area and its change, although visually striking, will not result in harm to the heritage significance of the conservation area. The green open spaces will be preserved and the leafy character of this part of the area will remain unchanged.

Conservation Area Boundaries (LBRuT)



View 1 - View from North down Waldegrave Road



View 4





View 2 - View from east down High Street



View 5



View 3



View 6

A greater sense of enclosure will be provided by the larger building at the Site, framing views out of the area down Broad Street but not interfering with the visibility of the historic buildings on the corner of Broad Street and High Street when looking west. When looking into the conservation area the new development will be highly visible from Broad Street but the experience of the conservation area and its heritage interest is only strong once the viewer is upon it and the visibility of the new building will not harm any appreciation for the fact that this is a High Street and an urban setting for the conservation area. It will not harm views toward the green open space in front of Elmfield House.

From further within the conservation area along High Street the new building will not be visible due to the height of the existing streetscape and the orientation of the road. In views from the Grade II Listed Elmfield House the new building will be an obvious new addition, but a views from the front of the listed building is defied by a large modern building and the addition of another one, further away, will not harm the appreciation of the surviving streetscape.

On the opposite side of the application site, to the west, the impact on the historic environment will be similarly benign due to the lack of clear views toward the application site from the Park Road Conservation Area and the lack of these views being significant to setting. From Park Road the new building will be an obvious landmark at the top of the slope but only when leaving the conservation area, heading northward, away from the area of heritage interest and surrounded by the existing modern development.

No views of listed buildings or view of importance within the conservation area from the southern and western sides will be affected by the proposed mass of the building due to the intervening screening of buildings and trees. In winter, the very top storeys of the proposed development may appear above and through the trees when looking north past the Railway Station (on the west side). However, this will be in the context of the existing building at No.2 Station Road.

The Site is not very sensitive to change because it does not fall within views of vistas of key importance to the heritage significance of the surrounding conservation areas hence there is an ability to develop the Site with a high quality contemporary scheme, providing affordable housing within a town centre location without dominating the built form within the conservation areas.

### **viii. Housing Mix & Standards**

Please refer to the supporting Design and Access Statement prepared by Wimshurst Pelleriti.

The London Plan and the Council's adopted policy and supplementary guidance set out standards that residential schemes are expected to achieve. Housing development will only be permitted where it meets internal space standards and provides appropriate external private or communal amenity space to meet the needs generated by the development.

In terms of space standards, the internal floor areas of the apartments meet minimum internal sizes.

Amenity space is provided in the form of private balconies. The new residential flats would be of a size likely to be occupied by young professionals within a town centre location with access to public open spaces that offers a variety of recreational and leisure facilities.

### **Accessibility & Inclusivity**

The proposed development will be designed to be an inclusive and welcoming building(s) accessible to all. All of the facilities will be an exemplar of accessibility, fully compliant with all relevant legislative requirements, and therefore maximising opportunities for everyone to benefit.

The proposed development will provide a safe and secure environment for both the residents and visitors. As with any scheme there are a variety of potential security risks, and it is necessary to ensure that security measures are proportional and have regard to the requirement for the Site to be publicly accessible and inviting. In brief, external security will be achieved primarily through vehicle management, access control and a robust building façade.



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## Internal Daylight Results

Please refer to the Internal Daylight Results prepared by Syntegra Consulting.

This report demonstrates that adequate levels of internal daylight are met on 76% of the habitable rooms. The minimum daylighting levels is defined as follow:

- Minimum daylight factor of at least 2.0% for kitchens/dining room
- Minimum daylight factor of at least 1.5% for living room
- Minimum daylight factor of at least 1.0% for bedrooms
- 80% of the working plane in each new space receive direct light from the sky

This report demonstrates that the No-Sky Line criteria is met on 100% of the habitable rooms. On average the proposed development will provide good residential accommodations.

### ix. Neighbourliness, Sunlighting & Daylighting

Please refer to the supporting Daylight, Sunlight and Overshadowing Assessment prepared by Syntegra Consulting.

Development Management Plan DPD Policy DM DC 5 states that in considering proposals, the Council will seek to protect adjoining properties from unreasonable loss of privacy, pollution, visual intrusion, noise and disturbance.

The results of the assessment show that in terms of:

#### Daylight

Daylight, this report demonstrates that the levels of sunlight at the surrounding buildings at 10-11 Enterprise Way, at 3 High Street and at 1 to 9 Park House are adequate. BRE criteria met.

#### Sunlight

Sunlight, this report demonstrates that the levels of sunlight at the surrounding buildings at 10-11 Enterprise Way, at 3 High Street and at 1 to 9 Park House are adequate. BRE criteria met.

#### Overshadowing

Overshadowing, this report demonstrates that the existing balcony located at 1 to 9 Park House will not be adversely impacted by the proposed development. BRE criteria met.

On balance, it can be concluded that the surrounding buildings at 10-11 Enterprise Way, at 3 High Street and at 1 to 9 Park House will not be affected by the proposed scheme.

### x. Transport & New Development

Please refer to the supporting Transport Statement prepared by Kronen Limited.

It is necessary to consider the impact of any new development on the existing wider and local transport network for all modes, how it links to the network, impacts on highway safety, the impact of parking and servicing, and with larger developments what provision for movement and parking for cars, bicycles and coaches (if appropriate) is made within the development itself.

Development Management Plan Policy DM TP 8 expects that the maximum parking standards are met, unless it can be shown that there would be no adverse impact on the area in terms of the street scene or on-street parking.

Existing pedestrian and vehicle access arrangements and servicing arrangements will be retained.

The proposal includes ten vehicle parking spaces at lower ground floor level inclusive of one disabled bay and two private dedicated pool cars for the development operated by Co-Wheels for RHP.

All proposed parking will be allocated to future residents.

The Applicant will agree to a Section 106 Agreement to remove all of the new development's future occupants' eligibility for CPZ parking permits thereby making the proposal "car capped" by including an element of "car free" housing. The applicant will also agree to a Section 106 Agreement offering residents three year membership to the local Zipcar car club scheme set out in Section 4 of the supporting Transport Statement.

The proposals also includes two separate internal and secure cycle parking spaces at ground floor level. One store provides forty cycle spaces for residents and the other cycle store provides six spaces for the commercial / office unit. In addition there are two short stay cycle spaces at ground floor.

Refer to Wimshurst Pelleriti accompanying plans for the proposal's site layout, access, refuse stores, cycle and vehicle parking.

Given the sustainable location above and the mitigation measures proposed, it is considered that the proposals support / are supported by these Development Plan policies. To support this Census data has been researched and shows that, on average, regardless of location or mitigation measures, approximately half of all flats in Richmond have no cars and that affordable / social housing occupants own less cars than other tenure types.

A search of applications heard at planning committee has also revealed there is planning precedent for car free and capped developments in centres such as Teddington, this precedent is considered a supportive material consideration.

The proposals provide secure internal cycle parking in excess of the minimum standards set out in Policy DM TP 7 of the Development Management Plan DPD and London Plan and are therefore considered acceptable.

## **Construction Management**

Please refer to the supporting Construction Management Plan prepared by F3 Group.

The Construction Management Plan addresses every aspect of building a project. The plan must satisfy the requirements of the permitting bodies, inspection bodies, and the parties the project is being built for. It should detail every aspect of construction, including construction drawings, permits, safety, environmental, costs, schedule, construction personnel activities, project authority, etc. With this plan the on-site project management can oversee every detail of the project, including emergency response and project change procedures.

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## xi. Sustainable Construction

Please refer to the supporting Energy Strategy Report prepared by Syntegra Consulting.

As per the recent review of the housing standards, the new dwellings is not required to be assessed under Code for Sustainable Homes (CFSH).

Policy CP1 of the Core Strategy DPD states that the Council will seek to maximise the effective use of resources including water and energy and will assist in reducing any long term adverse environmental impacts of development. Development will be required to conform to the Sustainable Construction Checklist SPG. Furthermore, Core Strategy DPD Policy CP2 states that the London Borough will reduce its carbon dioxide emissions by requiring measures that minimise energy consumption in new development and that it will increase the use of renewable energy by requiring all new development to achieve a reduction in carbon dioxide emissions of 20% from on site renewable energy generation unless it can be demonstrated that such provision is not feasible.

Development Management Plan Policy DM SD 2 sets out a hierarchy that first requires an efficient design to minimise the amount of energy uses, secondly by using low carbon technologies and finally, where feasible and viable, including a contribution from renewable sources. Notwithstanding this, developers are encouraged to achieve a 20% reduction in total site CO<sub>2</sub> emissions from the use of the renewable energy, to improve savings beyond those generated by energy efficiency measures, as set out in Core Strategy Policy CP2. This aim is also expressed in DM SD2 in which it is a requirement to 'maximize' opportunities for the micro-generation of renewable energy. Policy DM DC1 notes that the aesthetic considerations of the renewable energy technologies must also be considered in any submission. The policy requirement is to meet BREEAM 'Excellent'.

The recommendation for the proposed development is to achieve U-values and air permeability better than Building Regulations Part L1A/2A; to install high efficiency electric room heaters and hot water systems for residential units; to install high efficiency room heaters by Air Source Heat Pumps (COP 4.2) for the commercial unit; to equip Mechanical Ventilation with Heat Recovery (MVHR) for residential units; to use Accredited Construction Details for all thermal bridging junctions; to install low energy lights; and to allocate 37.8 kWp PV on the roof. This is based on the following reasons:

1. The strategy would provide an average of 36% CO<sub>2</sub> reduction saving (DER/TER) against Building Regulations Part L 2013 baseline. Therefore, the strategy meets requirements of the London Plan policies and Local policies.
2. The following hierarchy of the Mayor's Energy Strategy has been explored and implemented:
  - BE LEAN: Energy efficient design
  - BE CLEAN: Connection to district heat networks or communal heating systems
  - BE GREEN: Installation of on-site renewable energy technologies
3. At BE LEAN stage, energy efficient measures (high performance building fabric, efficient heating and hot water systems, Accredited Construction Details, low energy lights, and efficient ventilation systems) were suggested, and would provide about 2% carbon reduction.

4. At BE GREEN stage, PV panels of 37.8 kWp were proposed for the whole development, and would provide a 35% carbon reduction. The PV panels would be located on the roof areas (approximately 120 panels with 315 w/p are required).
5. The pre-assessment for BREEAM New Construction (2014) has been undertaken for the commercial unit demonstrating that an “Excellent” rating can be achieved [See the Appendix for the pre-assessment report].

After the application of the Energy Hierarchy, the regulated carbon dioxide emissions and savings are presented on the table below:

Energy Hierarchy	Strategies	Regulated Carbon Emissions (Tonnes CO <sub>2</sub> /yr.)
BASELINE	TER set by Building Regulations 2013 Part L	46.15
BE LEAN	After energy demand reduction	45.31
BE CLEAN	After CHP/ Communal Heating	45.31
BE GREEN	After renewable energy	29.44

Table 1 Carbon Emissions after each stage of the proposed strategy

The chart below summarizes the regulated carbon dioxide savings from each stage of the proposed strategy:

Energy Hierarchy	Strategies	Regulated Carbon Savings	
		Tonnes CO <sub>2</sub> /yr.	%
BE LEAN	After energy demand reduction	0.84	1.82 %
BE CLEAN	After CHP/ Communal Heating	-	-
BE GREEN	After renewable energy	15.87	35.02 %
<b>Total Cumulative Savings</b>		<b>16.71</b>	<b>36%</b>
<b>Total Target Savings</b>		<b>16.15</b>	<b>35 %</b>

Table 2 Carbon dioxide Emissions after each stage of the Energy Hierarchy



Figure below illustrates the hierarchical approach adopted and the resultant reduction in overall CO<sub>2</sub> emissions:

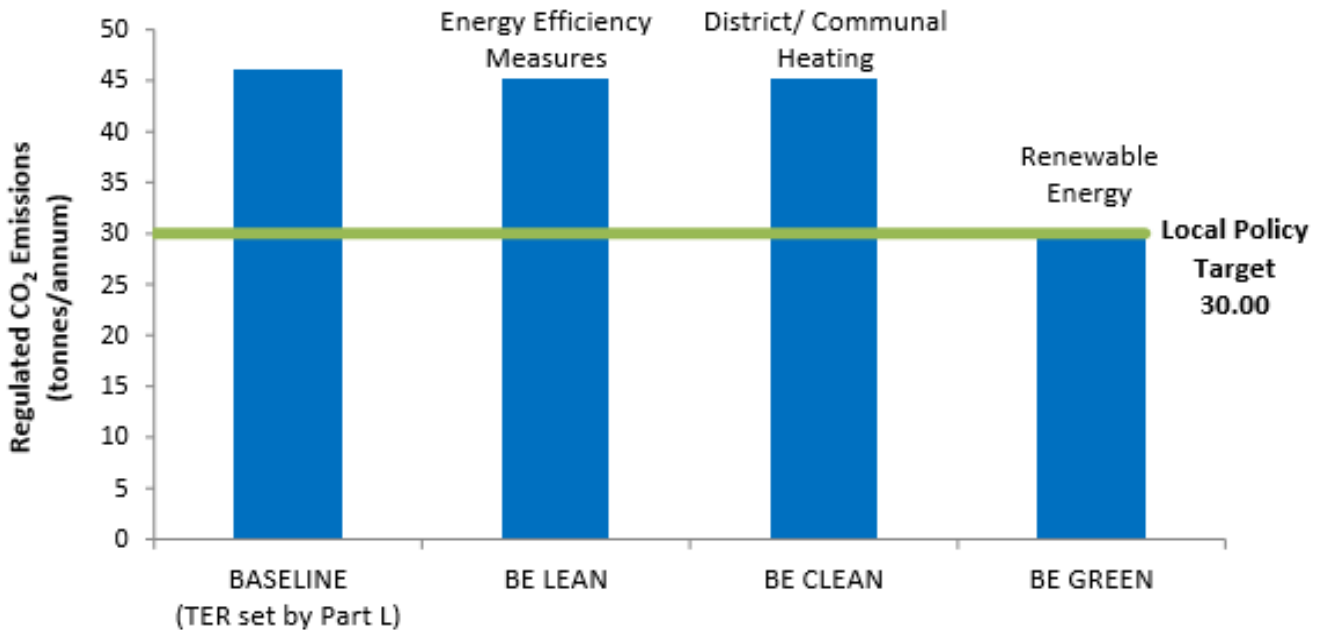


Figure 1 Carbon Emissions in Energy Hierarchy

## xii. Environmental Constraints

### Air Quality

Please refer to the supporting Air Quality Assessment prepared by Peter Brett Associates.

A whole borough AQMA has been declared in Richmond upon Thames due to exceedences of the annual and hourly mean NO<sub>2</sub> and the 24-hr mean for PM<sub>10</sub> objectives.

The construction works have the potential to create dust. During construction it is recommended that a package of mitigation measures is put in place to minimise the risk of elevated PM<sub>10</sub> concentrations and dust nuisance in the surrounding area within a Air Quality and Dust Management Plan. With mitigation in place the construction impacts are judged as not significant.

The long-term objectives for NO<sub>2</sub> and PM<sub>10</sub> are not predicted to be exceeded at any of the proposed residential receptor locations modelled at first and second floor levels. Given this, the proposed development is considered suitable for residential development without the need for further mitigation measures.

Additional mitigation to meet the requirements of the air quality neutral criteria may be required.

## **Flood Risk**

Please refer to the supporting Flood Risk Assessment and Surface Drainage Strategy prepared by RPS Group.

The Site is within Flood Zone 1 and no significant risks have been identified from the other sources of flooding assessed.

It has been demonstrated that the development meets the Sequential Test imposed under the National Planning Policy Framework.

Overall, it has been demonstrated that the development would be safe, without increasing flood risk elsewhere, and that a positive reduction in flood risk would be achieved through the use of an underground attenuation tank which will reduce runoff rates to the lowest practical minimum rate.

## **Contamination**

Please refer to the supporting Phase 1 Contamination Assessment prepared by RPS Group.

Given the former railways historically present on site and subsequently the unknown nature of land uses, there is the potential for a limited degree of contamination to be present beneath the site. However, RPS notes that no specific potentially contaminative features (i.e. tanks) have been shown on site on historical mapping, reducing the risk of any significant contamination existing.

Following redevelopment the Site is proposed to comprise almost complete building and hardstanding cover. This will provide a significant degree of protection to site users by severing pathways between any underlying contamination (if present) and future site users and also restricting the potential for rainfall infiltration and subsequent leaching of any contamination (if present) beneath the Site.

Redevelopment proposals also indicate that residential properties will be situated at first floor level and above. As a result of this direct pathways between residential properties and any underlying contamination (if present) are not considered to exist.

The substantial thickness of low permeability London Clay beneath the site will limit the potential for the vertical migration of any contamination (if present) beneath the Site and offer a significant degree of protection to deeper, more sensitive, groundwater resources.

Overall, the Site is considered to be suitable for its proposed redevelopment to residential use from a ground contamination perspective.

No further work is required relating to ground conditions / contamination at the Site, in relation to its proposed redevelopment to residential use.

## Noise

Please refer to the supporting Noise Impact Assessment prepared by Peter Brett Associates.

Measured vibration dose values (VDV) were found to be below the threshold where there exists a low probability of adverse comment, and so groundborne vibration due to the railway is not considered an issue. Predicted levels of maximum structure borne noise due to passing trains at night indicated that they may exceed the threshold of 45 dB LAmax.

In conclusion it is considered that the development can achieve recommended levels of internal noise and vibration, provided that a scheme of mitigation is adhered to.

### xiii. Planning Obligations

The Applicant would enter into discussions with the Council on the appropriate planning obligations necessary to mitigate the impact of the proposed development. However, it is imperative that the Applicant understand the Council's financial contribution to the Affordable Housing Fund.

## 7. CONCLUSIONS

Although the proposed building is of a greater mass and scale than the existing building, in considering the context of the Site, the modern built form surrounding it, the orientation of views toward and from it and its town centre location it is considered appropriate to develop a building of this size and scale.

The increased scale at the Site will serve to provide enclosure to the streetscape at the western end of the High Street in Teddington and will improve the architectural offering of the townscape on the edge of the conservation area. No key views that contribute to an appreciation of the historic and architectural interest of the conservation areas will be harmed by the proposed development.

By designing a building to fit within the surrounding context the pre-application scheme will not devalue the heritage significance of the conservation area and will not harm the relationship between the listed buildings close by and their settings.

Local policy seeks to preserve the character and appearance of a conservation area and this development will comply with that policy. No harm to heritage significance is assessed. Furthermore, there are significant benefits to sustainability in respect of the reduction in traffic, energy efficiency, and enhancement of the surrounding area and its setting.

The scheme provides much needed affordable / social housing. The scheme would provide an excellent standard of accommodation, improve the character and appearance of the surrounding area, have a positive impact on the amenity of the surrounding or new occupiers.

It is, therefore, respectfully requested that this Application be granted consent.

I trust this letter and supporting documents provide sufficient information and I look forward to receiving formal registration / validation of the Application in due course. However, please let me know should you require any additional information or have any queries.

Yours faithfully,



**James Lloyd** B.Sc (Hons) M.Sc TCP MRTPI  
**Managing Director**