
Former Imperial College Private Ground
Udney Park Road, Teddington

Supporting Planning Application Statement

January 2018

**Former Imperial College Private Ground
Udney Park Road, Teddington
Planning Statement**

Prepared on behalf of
Quantum Teddington Development Ltd, Quantum Teddington LLP
And Teddington Community Sports Ground Community Interest Company

Prepared by
Barton Willmore LLP

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1.0 INTRODUCTION

- 1.1 We act on behalf of the owners, Quantum Group, of the former Imperial College London Private Ground in Teddington, West London. The site extends to 12.76 acres (5.05 hectares) and was previously used by Imperial College London (ICL) for its private sporting use until relocating to a new site in 2015. The site remains as a private use on an ad hoc basis.
- 1.2 As agents for the application, we are instructed to submit a full planning application for the development of the site to provide a mixed-use community-led scheme. The scheme will provide an extra care community and new GP surgery on 3.18 acres of the site (this includes the conversion of the existing clubhouse). The remainder of the site will be enhanced for formal and informal recreation use and will be gifted to the local community. Alongside the planning application, Quantum Group has also assisted with the formation of a new Community Interest Company (CIC) (Teddington Community Sports Ground CIC). The CIC will take over ownership in perpetuity and the running of the public open space in the community's interest, should planning permission be granted. The names of the applicants are as follows: Quantum Teddington Development Ltd, Quantum Teddington LLP and Teddington Community Sports Ground Community Interest Company (TCSG CIC). The aim of this supporting planning statement is to explain why, in the view of the applicants, the planning application proposal should be supported and approved.
- 1.3 This planning application must be considered in the context of changes happening to the UK economy, public sector funding, and health and social care responsibilities, which will require innovation between the public and private sectors if similar levels of elderly care provision are to be maintained. In our view, this context has important implications for how land is used and developed, and planning applications considered and determined.
- 1.4 The planning application presents opportunities for real public benefit. In its simplest form, the proposal is that some development (predominantly comprising an extra-care community and GP surgery on 3.18 acres of the site) should be permitted on land designated in the adopted Local Plan as "Other Open Land of Townscape Importance" (OOLoTI). Such land is normally expected to be kept free from development, apart from in 'special circumstances' which are met here. The proposed development will help to fulfil the important social care needs of the community, which the public sector is increasingly finding hard to meet. The scheme will also fund the development of meaningful and desirable new recreational facilities on the remaining 9.5 acres of the site which will be made accessible to Borough residents for the first time. This will be achieved by divesting 9.5 acres of the site,

including new sports and community facilities and public park proposed as part of the application, into community ownership in perpetuity alongside a business plan that will ensure an on-going income stream to maintain the facilities in the long term.

1.5 The benefits and the positives of the scheme, briefly outlined above, materially and substantially outweigh any potential negative aspects of the proposal.

1.6 The formal description of development is:

"Erection of a new extra-care community, with new public open space and improved sports facilities, comprising: 107 extra-care apartments (Class C2 use), visitor suites, and associated car parking; 12 GP surgery (Class D1 use) and associated car parking; new public open space including a public park, and a community orchard; improved sports facilities (Class D2 use) comprising a 3G pitch, turf pitch, MUGA, playground, pavilion and community space, and associated parking (68 spaces); paddock for horses; and a new pedestrian crossing at Cromwell Road; and all other associated works."

1.7 The structure of this Planning Statement is as follows:

- **SECTION 2** - A review of the wider social context in which to see the application proposal and therefore consider what value to place on the proposal's benefits;
- **SECTION 3** - A more detailed review of the scheme proposal, including the role and set up of the CIC;
- **SECTION 4** - The planning history of the application site, and present statutory designations;
- **SECTION 5** - A review of applicable "in principle" planning policy, including the adopted policies and emerging replacement policies;
- **SECTION 6** – A summary of public consultation and engagement undertaken; and
- **SECTION 7** – A conclusion on how the planning application responds to policy, including material considerations, and why, on balance, we consider the planning application complies with policy and should be approved.

2.0 CONTEXT

2.1 As set out in the previous section, the scheme will provide:

- a 12 GP surgery;
- extra care accommodation;
- improved recreational and sports facilities; and
- the provision of 9.5 acres of former private land to the community for public use.

To fully appreciate the potential importance and value that the planning application scheme could bring to the community, it is necessary to have a broad understanding of the planning context of the UK, London and as well as locally within the London Borough of Richmond-upon-Thames.

Operating the Planning System

2.2 Across the UK, the development of land is required because our population continues to expand and the types of buildings we need are evolving. However, geographically, the pressure for development is not uniform. The south-east, and in particular London, is facing far greater pressure than elsewhere and is already one of the most densely populated parts of the country.

2.3 Decision makers are required to weigh the pros and cons of development proposals based on locally derived objectives. These objectives may not always be aligned with wider national objectives and so that in certain circumstance the Government can override local decisions. The idea is that the system of checks and balances means that whilst the process may be influenced by self-interest, it cannot be unacceptably excessive.

UK Wide Care and Health Context

2.4 As a result of the state of the UK finances and national political debate, public sector services (national and local) are under intense pressure:

1. Our health service has never been as stretched as it is now – this is impacting people’s life chances and people are dying unnecessarily. In the publication “The State of the NHS Provider Sector, November 2016”, the report confirms:

"There is now a clear gap between what the NHS is required to deliver and the money available....the NHS is now running higher levels of risk. The risks include: The service the NHS provides now starts to deteriorate... Despite good progress in reducing trust deficits in the short term, there is no credible plan to ensure the long term financial sustainability of trusts....Current NHS system level plans assume a rate of transformation that is unlikely to be delivered..."(see page 6)

According to another recent report by the King's Fund – "Understanding Pressures in General Practice, May 2016" –

"General practice is in crisis. Workload has increased substantially in recent years and has not been matched by growth in either funding or in workforce.... Practices are finding it increasingly difficult to recruit and retain GPs...As the pressures on general practice have grown, the experience for patients has deteriorated.... Securing the future of general practice cannot be achieved simply through more of the same..." (See pages 3-4).

2. Social services, delivered by local authorities, are also failing to provide the required level of services all of the time, and with an ageing population, this will only get worse. The report of the Parliamentary Select Committee (Communities and Local Government) into Adult Social Care, March 2017, looked at the funding pressures on services and their "very serious consequences". The report advises:

"Fewer than one in twelve Directors of Adult Social Care are fully confident that their local authority will be able to meet its statutory duties in 2017–18." (Paragraph 13)

3. The New Policy Institute published a report in June 2016 titled: *"Sustainable Local Government Finance and Liveable Local Areas: Can we Survive to 2020?"* It suggests that following the recession, local government spending/funding has dramatically declined and by 2020 will be less, as a proportion of GDP, than at any time since 1948. It goes on to say that government policy is to remove the revenue support grant that redistributes money to local authorities and replace it with a devolved approach where local authorities will generate at least 80% of their income through council tax and business rate receipts. This is significant because the ability to raise money by council tax and business rates is uneven across the country. This means the "squeeze" on services that are not required to be protected, such as libraries, public realm

maintenance etc. will continue and inevitably there will be a worsening of those services that are protected.

4. In respect to housing, it is commonly accepted that not enough housing (market and especially affordable) is being built in the right places to meet demand and, as a consequence, life chances are being impacted. The Government sees housing shortage as one of the most pressing problems to address (See the Housing White Paper – Fixing Our Broken Housing Market, February 2017, particularly the Prime Ministers foreword);
5. Within the general housing shortage, specifically not enough affordable elderly care, and extra care housing is being provided to meet demand – causing life chances to be impacted both for the older generation, but also for younger generations as family homes are not being freed up by downsizing (See the Housing White Paper – Fixing Our Broken Housing Market, February 2017, particularly chapter 4);
6. The Resolution Foundation published its report on “Living Standards 2017” in February 2017. It concludes that:

“... the parliament from 2015-16 to 2020-21 is on course to be the worst on record for income growth in the bottom half of the working age income distribution. At the same time, we project the biggest rise in inequality since the 1980s, with inequality after housing costs reaching record highs by 2020-21.... Our projected combination of weak average growth, falling incomes for the bottom half and rising inequality is perhaps without precedent.” (See Executive Summary and pages 10-11).

- 2.5 The reason for identifying the above is to identify that if there is scope through the development of land and buildings to help backfill some of the shortcomings facing our public sector funding and our national housing crisis, then such options should be pursued. It is in this broadest of contexts that the application proposal sits as it undoubtedly will address many of the shortcomings identified above.

London Context

- 2.6 Similarly with the UK analysis given above, London is also under pressure, particularly to meet private and affordable housing demand. It is a world city that is expanding. Central London has been the focus of much redevelopment to meet economic activity and population growth over recent years and its ability to continue to be made more dense is

reducing. That means outer London Boroughs are now the focus for meeting much of the development demand.

- 2.7 Inevitably, outer London Boroughs are seeking to preserve their environments and character, and resist unacceptable densification and building on open land, although in doing so, this often means that one section of society is looking to preserve its way of living at the expense of others. That is not to disregard the need to protect the character of the most valuable parts of the natural and built environment, but it does mean protecting less worthy sites may be less justifiable due to the pressure on the London housing market and particularly on social care.
- 2.8 The application proposal has the potential to meaningfully respond to UK and London's wide social and planning issues, whilst not unacceptably changing the character of the area.

The London Borough of Richmond-Upon-Thames

- 2.9 It is acknowledged that Richmond is one of the most attractive, green, and low-density boroughs in London. It has one of the highest life expectancies, highest average house prices, and highest average earning per person. Subjectively, it is one of the nicest places in London and the UK to live. It has large areas of open space, including two Royal Parks and over 100 other parks. The green spaces across the borough are very important to the borough's character.
- 2.10 The demographics of Richmond (see the Accompanying Care Needs Assessment, August 2017) confirms that Richmond has a high percentage of its population above the age of 50 when compared to the rest of London or the UK. This variance is set to increase in population predictions to 2025. The notably ageing borough-wide profile will place additional pressure on the provision of elderly care accommodation and associated services and facilities.
- 2.11 Given its proximity to central London and its desirability, Richmond is under constant development pressure. Preserving its character and desirability is important to the success of London overall. However, the Borough still needs to contribute to meeting the needs of its existing and future residents (in terms of provision and access to community facilities, medical care, social care and so on) and wider London through maximising the use of its land and buildings, whilst protecting those elements that are fundamental to its success.

Teddington

- 2.12 Teddington is one of the 14 defined “villages” within Richmond. Whilst it is an affluent, attractive, and quiet, predominately residential, it faces similar problems to other parts of the country in being able to sustain high levels of public services. In particular, there is a significant local issue around the suitability of GP provision and social care. Whilst Teddington benefits from lots of open spaces, issues about publicly accessible formal open space for local sports clubs exist (see accompanying CIC Business Plan). It is in this context that the Teddington Community Sports Ground CIC has been established and consideration given to how the Former ICL Private Ground could be better utilised for the community, whilst preserving the important contribution it makes to the character of both Teddington and Richmond. The application will provide real benefits to Teddington residents through the provision of publicly accessible formal and informal recreation, medical care, and social and housing care for older residents.

3.0 SITE DESCRIPTION, HISTORY AND FORMATION OF THE CIC

- 3.1 The site extends to 12.76 acres and is trapezoid in form. It is located within the Teddington area of the London Borough of Richmond upon Thames. Teddington High Street is 160m to the north and Teddington railway station is approximately 300m to the west. The site is generally flat and open, although around the edges of the site are mature trees and boundary enclosures.
- 3.2 The site was originally owned by Robert Fullerton Udney and family descendants as part of a wider estate. It was sold several times in the 1920s before being purchased by the Merchant Taylor's School when it was laid out as playing fields. In the late 1930s the site became the property of Lord Beaverbrook who later gave the land to St Mary's Medical School. St Mary's merged with Imperial College London (ICL) in 1988. Some of the site was sold off and redeveloped for the Fullerton Court sheltered housing scheme in 1998. Since then the remainder of the site has continued to be used privately by ICL for recreation. Over the years, ICL has occasionally allowed a small number of other groups to use the site. In 2015 ICL moved its sports facilities to a new site and the application site was sold to the Quantum Group and it currently remains a private site with ad hoc sporting use.
- 3.3 During the sale process, local community groups sought to purchase the site but failed to do so. There was concern about the ability for a community group to invest the required money into the facilities to bring them up to a standard that could be used regularly and generate a sufficient income to afford the on-going maintenance costs.
- 3.4 The Quantum Group purchased the site with a view to creating a scheme where substantial community benefits could be created and the majority of the site given to the local community for its use. The Quantum Group did not oppose the local community proposing that the site become a formal Asset of Community Value (ACV). This took place in 2016. Quantum has also worked with local community groups and supported their temporary use of the site for sports, including the provision of a subsidy for its use. However, from this experience it is clear that the facilities are currently in such a state of disrepair that a sustainable on-going business model could not be established on the basis of the current facilities and the Teddington Athletic Football Club handed back its lease of the site in 2017.
- 3.5 As part of the Quantum Group's commitment to assisting the local community in using the site, it provided its support to the formation of a Community Interest Company (CIC), whose directors are members of the local sporting community and leaders of local

community groups. The intention is that the planning application proposals, if approved, will enable the redevelopment of the site with the provision of enhanced sporting and recreational facilities the freehold of which will then be transferred, at no consideration, to the CIC in perpetuity. The CIC will therefore inherit a financially viable on-going community facility that would be run by and for the benefit of, the local community. Following the requirements of the Asset of Community Value (ACV) process, the freehold of the asset will be transferred to the CIC.

- 3.6 The creation of CICs was made possible by the government in 2005 for the purpose of promoting social enterprise and putting assets into the hands of local people. The identifying feature of CICs is the requirement for an "asset lock" mechanism which in the context of the planning application ensures that the 9.5 acres of land and the facilities are placed completely under the control of the CIC and therefore owned for the benefit of the community. The "asset lock" further prevents the CIC from disposing of the asset to any entity which not also subject to an "asset lock". A CIC regulator has been appointed by the Government to oversee and control the operation of CICs so that they always deliver social benefit.

4.0 THE SCHEME PROPOSAL

4.1 The site extends to 12.76 acres. Its current lawful use is for outdoor sport and recreational use (Use Class D2). It is an area of land that has very few buildings or structures on it, other than the existing clubhouse. The clubhouse includes a single dwelling on the second floor, which is a two bedroomed flat. Public use of the site is discretionary and historically was extremely limited, due to the facilities being for the private use of ICL. It is an asset that under performs in terms of how people use it. There is an opportunity to change this, which forms part of the planning application proposals. The proposed scheme comprises the following:

4.2 To develop 3.18 acres of the site to provide:

Plot A - 6 buildings ranging in height from 20.56m AOD to 22.81m AOD. One of the buildings will be used for a 12 GP surgery and pharmacy (Use Class D1). Access will be unrestricted to local residents. A second building will be used to provide the communal facilities associated with the extra care community, including restaurant, bar, lounge, health suite, staff offices, small shop for residents, health and beauty salon, and multi-functional spaces, which will be available to residents and the local community. Dwellings are proposed in the upper levels of the building. The remaining 4 buildings provide the apartment accommodation for 92 extra care units (Class C2). A basement level is provided consisting of 63 car parking spaces, bin stores, staff changing facilities, etc.

Plot B – Proposes the conversion of the existing clubhouse into an extra care apartment block for 6 units plus visitor suites.

Plot C – Proposes a new build extra care apartment block providing 9 apartments.

Plots B and C are satellite dwellings to the main hub of the development provided in Plot A and they benefit from full access to the communal and health facilities in the wider development.

4.3 The construction of an extra-care community is beneficial because it provides: (a) a for profit scheme that benefits the community, providing the funding for a new community interest group to own, run and manage the 9.5 acres of sports and community land; and (b) the enabling use itself is meeting a pressing social need to deliver more affordable more elderly care accommodation and GP medical facilities in a borough that is expected to see

its population age over the next decade. Platinum Skies Living Ltd (part of the Quantum Group) is a registered Social Landlord (RSL), regulated and audited by the Homes and Communities Agency. The part buy/part rent tenure is available through the Government's Older Persons Shared Ownership Scheme (OPSO) and is an important part of the Government policy to address the housing crisis in the UK (as set out in the Housing White Paper, February 2017). It is proposed that 50% of the extra care apartments will be sold under the shared ownership tenure with the remaining being available as either shared ownership or outright purchase.

4.4 The remainder of the site (9.5 acres) will be transferred to the "Teddington Community Sports Ground Community Interest Company". This is a local community initiative set up and run for the benefit of the local community (as described above).

4.5 The application proposes to fund and redevelop the existing sporting facilities on-site to provide "state of the art" new sporting and recreational facilities, which can be run as a for profit enterprise, so that the site will be self-financing for the benefit of the community (represented by the CIC) in perpetuity. All profits are channelled back into the CIC to continue to improve and enhance the facilities provided. The facilities developed will be:

(a) Formal sports facilities:

1. A new pavilion;
2. A new 3-G artificial pitch;
3. A turf-pitch;
4. A MUGA;
5. A paddock;
6. A children's playground;
7. Petanque courts;
8. Coach park; and a
9. Pedestrian crossing on Cromwell Road

(b) Informal recreation:

1. A new public park;
2. Outdoor Gym and Fitness Trail; and
3. Community Orchard with Medicinal Herb Garden

4.6 The accompanying supporting planning application documents provides further detail on the CIC arrangements, the community plans for the site, and its management. The Section 106

Heads of Terms also sets out how the CIC will be gifted the land and facilities, should planning permission be approved.

- 4.7 Further detailed information about the scheme is set out in the accompanying Design and Access Statement.

5.0 PLANNING POLICY CONTEXT

5.1 The development plan comprises:

1. The London Plan, 2016; and
2. London Borough of Richmond Upon Thames (LBRuT) Core Strategy, 2009, and Development Management Plan (November 2011).

5.2 In terms of planning policy, the main material considerations in respect to the principle of the development, include:

1. NPPF and PPG;
2. Draft London Plan 2017;
3. LBRuT emerging replacement Local Plan; and Hampton Wick & Teddington Village Plan SPD, June 2017

5.3 Below we consider how the application proposal responds to policy. We consider first the acceptability of the scheme as a matter of principle and second the detail of the scheme in terms of complying with development control standards.

Open Land of Townscape Importance

5.4 The geographical location of the site means that it is a suitable location for the development proposal, being well located in the vicinity to shops, services and public transport. In principle we consider general policy would support the proposal. However, there is a specific site allocation that seeks to preserve the site in its current open form. The site is presently allocated in the adopted Development Management Plan (2013) under policy DM OS 3 as "*Other Open Land of Townscape Importance*" (*OOLoTI*). The adopted policy wording (see below) and the supporting text (see below) seeks to preserve the site's openness. The policy does, however, enable a judgement to be made about the merits of any proposal and allows for some loss of open space to be acceptable.

Policy DM OS 3

Other Open Land of Townscape Importance

Other open areas that are of townscape importance will be protected and enhanced in open

use. It will be recognised that there may be exceptional cases where appropriate development is acceptable. The following criteria must be taken into account when assessing appropriate development:

1. It must be linked to the functional use of the Other Open Land of Townscape Importance; or
2. It can only be a replacement or minor extension of existing built facilities;
3. In addition to 1 or 2, it does not harm the character and openness of the open land.

Improvement and enhancement of the openness and character of other open land and measures to open up views into and out of designated other open land will be encouraged where appropriate.

When considering developments on sites outside designated other open land, any possible visual impacts on the character and openness of the designated other open land will be taken into account.

5.5 The supporting text to the adopted policy explains further:

"4.1.9 The purpose of this policy is to safeguard this open land and ensure that it is not lost to other uses without good cause. Protecting and opening up views into and out of designated other open land is encouraged because of the contribution to the distinctive character of an area and the benefits to all. Where a comprehensive approach to redevelopment can be taken, such as on major schemes or regeneration proposals, or for social community or educational uses, it may be acceptable to re-distribute the open land within the site, providing that the new open area is equivalent or improved in terms of size, shape, location, quality and potential ecological value."

5.6 Set in this adopted policy context, the community presently has no entitlement to use any part of the site. Therefore, the only benefit the site presently provides for the wider community is in its appearance and contribution to character. That appearance is limited to what it looks like from its boundaries as there are few places where views across and into the site can be seen. It therefore means the "setting" and "character" benefits the site brings is limited and restricted to those houses that directly back onto or face onto it. Further information and justification can be found in the accompanying Townscape and Visual Impact Assessment.

5.7 Excluding the clubhouse and its demise, the proposal will see the open land portion of the site reduce to 9.5 acres. The applicants believe that this "loss" is justified by a "good cause", namely the wider community benefiting from:

1. 9.5 acres of new publicly accessible formal and informal open space. In a densely developed London the opportunity to create such a new community asset is rare and therefore important and meaningful.
2. The new open space will provide both new organised sporting facilities (3G artificial pitch, grass pitch, MUGA/tennis court etc.) and informal recreation in the form of a new park with children's play, trim trails and orchard. The spread and variety of facilities will result in the site having wide appeal and accessibility.
3. A new community centre/pavilion will not only provide changing facilities associated with the sports pitches but also a space available for use by the wider community.
4. The new access and facilities proposed for the public, set out above, will result in a publicly accessible facility that is open all year round.
5. A new 12 GP surgery will be provided for the rehoused and substantially expanded Park Road surgery. The surgery has been desperately seeking new enlarged facilities for a long time and has been unable to find suitable premises. This represents a significant benefit to the wider community in creating more local medical capacity in better facilities. The surgery will be open to the local community. A letter has been prepared by Dr. Nicholas Grundy of the Park Road Surgery, setting out its requirement and support for the proposals is enclosed at **Appendix 1.**
6. 107 extra care apartments with specialist care facilities. This will meet existing demand for older people's accommodation in the borough and responds to the increasingly ageing population.
7. The proposed open space will create improved boundary treatment, nature conservation and biodiversity value from the present condition of the site.

5.8 The accompanying Townscape and Visual Impact Assessment confirms that the site is not of national landscape importance, within a conservation area or publicly accessible, and has

detracting boundary treatments. The site does have some townscape value in that it contributes to the local character by virtue of its size and position, but not because of its quality, presence and openness. The site is not beneficial in terms of longer views due to the close proximity of surrounding properties, nor beneficial in terms of biodiversity, nature conservation or scenic value, given its sporting uses. Further, the site is not, and has not historically been, accessible to the public and therefore presents limited value to local people. The openness value of the site is limited because of the enclosure to the site and the surrounding built form. The location of the site close to roads and built form mean that there is no sense of remoteness or tranquillity. The site has no historic or cultural association to the townscape. Whilst the site is designated as Other Open Land of Townscape Importance (OOLoTI), the site does not comply with the full OOLoTI criteria (set out in paragraph 4.8 explaining Policy DM OS 3) in terms of value to local people. The site does perform a contrast with the surrounding area and has some Tree Protection Orders. The conclusion is that the site therefore has "medium" value.

- 5.9 In terms of visual appraisal, the accompanying report considers that the site's visual envelope is very localised and in terms of townscape susceptibility, it is considered to be low and capable of accommodating the proposed development without loss of integrity. The likely effects of the application proposal would be to enhance the openness and character of the land and as well as opening up views into and out of the open land. The scheme would increase the attributes that contribute to its designation as OOLoTI because it would become of greater value to local people by its public accessibility, and would be improved in terms of its biodiversity and nature conservation characteristics.
- 5.10 Based on this analysis the conclusions reached are that the site provides the opportunity to enhance the local townscape through the provision of substantial new public open space in combination with sports facilities. Whilst the scheme will introduce new built form and a change in the use of that part of the site, these overall proposals will improve the recreational value of the site, the scenic quality, the association with the wider townscape, and the function of the site in the community.
- 5.11 In terms of transport impact, the accompanying Transport Assessment concludes that the proposed development is not expected to significantly impact on the local road network. There are no technical reasons why planning permission should not be granted. The visibility splays at the access points meet the required standards.
- 5.12 Our conclusion in respect of the principle of the acceptability of the application proposal is that the benefits of the proposal clearly outweigh any harm resulting from development on

open space and therefore, notwithstanding Policy DM OS 3, planning permission should be granted.

Emerging Local Plan Policies (Principle)

- 5.13 The emerging Local Plan has been submitted to the SoS for examination. This commenced in September 2017. Minor changes to the wording of adopted plan policy and a new policy designating the application site (on the Proposals Map) as "Local Green Space" has been put forward. The applicants has objected and this has been discussed at the hearing sessions. The implication of the Local Green Space designation is that through the NPPF guidance, such an allocation should be treated as if it were green belt. This means that development can still be considered acceptable if very special circumstances can be demonstrated.
- 5.14 The applicants' position is that a Local Green Space designation is not appropriate to be applied to the application site. The reasons for this are set out in the representations made to the emerging Local Plan. Irrespective of the outcome of the Local Plan EiP the applicant considers that for the reasons already set out, "very special circumstances" exist whether or not the Local Green Space policy allocation is upheld for the site.
- 5.15 The draft London Plan (2017) is supported by the GLA Older Persons Housing Needs Assessment Report, 2017. This confirms that:
- There is a need for both extracare and sheltered units for sale and shared ownership;
 - Because there is so much stock relative to potential demand there is no need for additional provision of sheltered housing for affordable/social rent; and
 - It is recognised that many boroughs and Registered Providers have in place remodelling programmes which involve the demolition or adaptation of existing sheltered schemes to provide higher quality accommodation, generally as extracare. This type of activity has an important role to play in improving the quality of London's specialist housing stock.
- 5.16 The report also notes, that looking towards 2029:
- Extracare housing is needed across all three tenures – rent, sale and shared ownership;
 - There is potential demand for sheltered housing for sale and shared ownership and for market rent;

- There is no need for additional provision of sheltered housing for affordable/social rent; and
- Total potential demand for specialist older persons housing across London adds up to just over 4,000 units a year. This level of delivery is a step change from the 471 new homes a year which have been consented in the past two years, which in itself did not offset the loss of existing stock.

Relevant Planning Policy

- 5.17 As noted above, the proposals need to be assessed against relevant adopted planning policies, however, emerging planning policies are also a material consideration in the determination of a planning application. **Appendix 2** sets out relevant elderly, extra care accommodation and sport facilities policies in adopted and emerging planning policy that should be considered in the determination of the planning application.
- 5.18 The proposals are considered to meet policy or where a balancing judgement is required, the material considerations relevant to the determination of the planning application support the application proposals. The accompanying Design and Access Statement sets out the design and layout justification for the proposals.

6.0 PUBLIC CONSULTATION

6.1 Extensive public consultation and engagement has formed part of the application process and is explained more fully in the accompanying Statement of Community Involvement. Consultation and engagement has been on-going since early 2016. The positive and negative feedback is set out in the SCI and summarised below.

Positive

1. Previously underutilised private land is at long last being opened up to the community.
2. It will provide much needed sports facilities for everyone.
3. As well as sports, provision of good community space is welcomed.
4. Elderly care and retirement living is needed in the area.
5. A new GP facility is needed for Park Road Surgery.
6. Benefits provided to the community will outweigh the loss of open space.

Negative

1. Impact on the local area with an increase in traffic and proposed access.
2. Impact of having a doctor's surgery in the area.
3. Proposed scale and density.
4. Impact of construction.
5. The site should not be built upon.
6. The land should not have been sold to the Quantum Group.

6.2 In the final public consultation exercise (23 -24 June 2017) 280 visitors attended. 67% of the visitors completed feedback forms (186) and 56% agreed or strongly agreed with the proposal.

7.0 CONCLUSION - THE BALANCE JUDGEMENT (PRINCIPLE)

- 7.1 We consider the key issue associated with the planning application is whether the benefits of the proposal can be guaranteed and are considered to outweigh the impacts associated with developing a small part of a site, which adopted and emerging policy seeks to keep free from development. The reports accompanying the application demonstrate how the proposal is technically acceptable and responds to policy in respect of design, layout, sustainability, standards as well as providing the requisite special circumstances.
- 7.2 The applicants' view is that the site represents a rare opportunity to develop a comprehensive scheme that will have substantial benefits in terms of helping the community meet its medical, care, housing, and recreational requirements. These benefits can be delivered in a way that preserves and improves (rather than detracts from) the essence of the openness and character contribution the site makes to Teddington, Richmond and London as a whole. The legal arrangements that have been put in place with the setting up of the CIC and the development of their comprehensive business plan will ensure that these public benefits will be delivered.
- 7.3 The overall benefits package is considered to represent a special set of circumstances that mean the application should be supported. Whether it is judged that the application is contrary to or in accordance with policy, by virtue of these special circumstances, namely the overall benefit to the local community the scheme should be supported.

APPENDIX 1 – LETTER FROM THE PARK ROAD SURGERY

THE PARK ROAD SURGERY

37 Park Road, Teddington, Middlesex TW11 0AU

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Practice Manager

Emma Nicholls BA(Hons)

27th July 2017

Introduction

Park Road Surgery is a high-performing NHS GP surgery with a patient list size of 13,153 as of today's date. We are currently located in a converted Victorian house at 37 Park Road, Teddington TW11 0AU, and have been at this site for over 40 years. The existing premises are fully developed, and should serve a maximum of 3,800 patients, meaning that we are accommodating about 10,000 excess patients. This severely limits the practice's ability to respond to the healthcare needs of our population in a timely fashion, to expand on the employment and teaching/training opportunities we offer, and to deliver outstanding care.

Despite this our list continues to grow by about 2.4% annually, and we anticipate significant further pressures on our service from additional list growth from the current residential developments on Waldegrave Road and at Teddington Studios. We have been actively seeking new premises for eight years, and have been working with the CCG, NHS England, specialist medical developers, and the local council in an effort to achieve this.

Richmond CCG

Our need is recognised as urgent by the CCG, who have written in support of our premises need separately; their governing body minutes from 21st June 2016 note that we are a "key priority", describe our current building as "no longer fit for purpose", and we are listed in their Estates Strategy as a priority.

NHS England

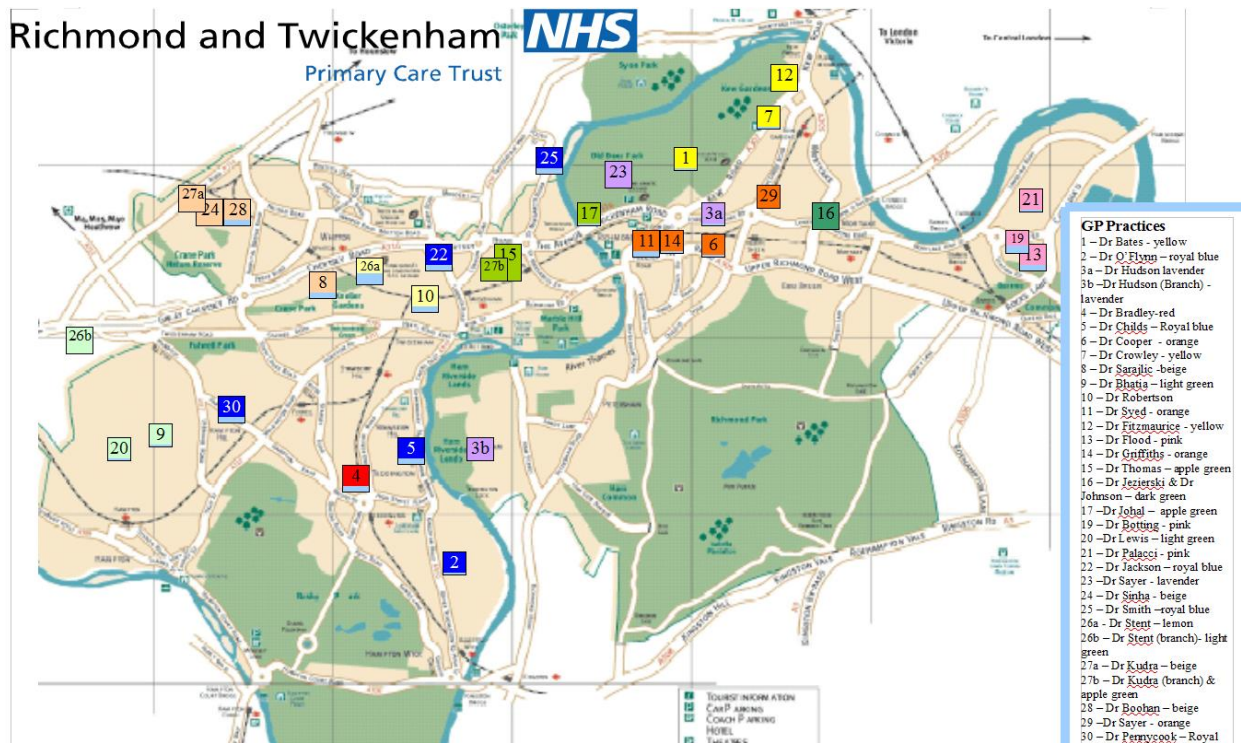
The CCG have a direct relationship with NHSE regarding premises, and the practice has supported their application for capital funding from national sources to support our need. Our situation is discussed regularly at primary care meetings by the CCG, and NHSE are supportive via our Local Area Team of the practice's need to relocate.

Richmond Council

We have been in discussions with Richmond Council since July 2014 over two sites which they own, and the possibility of co-locating health and social care elements on one of these. These negotiations were originally handled by the specialist healthcare developer Medicx / Octopus Health without success, and were subsequently reopened by the practice. We have continued to discuss these sites with Council Officers, Local Councillors, and the Cabinet Member with overall responsibility for Estates, emphasising the local healthcare need, the benefits in terms of social prescribing of the co-location of health and social care, and the ways in which the proposed development would support the Council's Local Plan, Village Plan, and their Primary Care Strategy. Despite this, the Council have blocked any attempt on our part to draw up plans accommodating either a community centre or charitable office space as part of a redevelopment, despite mutual enthusiasm from the surgery and from the community organisations, and as of May 2017 declared the option closed. Although they have since, under pressure from us, reopened negotiations, the practice and our Patient Participation Group do not feel their approach to date gives us any confidence that they are taking our need, and by extension the health need of the local population, seriously.

The community we serve

The practice is in the Teddington and Hampton locality of the London Borough of Richmond-upon-Thames, which serves approximately 52,000 patients through six GP practices (Broad Lane, Hampton Hill Medical Centre, Hampton Medical Centre, Hampton Wick Surgery, Park Road Surgery, Thameside Medical Practice). These are shown in the cluster map below; although this dates from 2012 there have been no changes in the practice's immediate locality since then, although there has been one GP surgery closure and one merger into new premises in the wider CCG area.



The local Council treats Teddington as a "District Centre" with regards to planning policy, and it is one of the five main town centres of the borough¹. Teddington and parts of Hampton are among the least deprived areas in the country, although there is within-ward deprivation particularly around Hampton North. The practice's current list size is about 25% more than the population of the Teddington Ward, reflecting that our catchment extends into five neighbouring wards of the borough, and our list is approximately 8% of the population of Richmond.

Benefits of the proposed scheme to the local population

Access to health

The proposed new surgery on the former Imperial College playing fields would dramatically improve access to healthcare for local residents, with capacity increasing by an estimated 105,000 appointments annually. It would particularly benefit those groups disproportionately disadvantaged by the poor physical access and DDA compliance of the current building, specifically those with children, mobility issues, and disabilities. It offers the local CCG a building tailor-made for providing additional networked services at scale, and the practice already employs doctors with special interests in areas including dermatology, diabetes, and minor surgery.

Employment and Training

As a local employer, we currently employ 31 staff, are a training practice for medical students, junior doctors, GP trainees, and have trainee pharmacists and apprentices from Kingston Adult Education at the practice. We are also looking at offering space which could be used by physiotherapists and other allied healthcare professionals, and for community use. The new surgery would increase employment and training opportunities in management, administrative, and clinical roles, with the training of doctors and nurses key to national plans for the future of the NHS including the *Five Year Forward View* and the *GP Forward View*.

¹ [Richmond Council Planning & Development](http://www.richmond.gov.uk/planning_and_development_teddington.htm) http://www.richmond.gov.uk/planning_and_development_teddington.htm

Capacity for population growth

The GP surgery will extent to c.1050m² of Gross Internal Area (GIA), and this is calculated based on the practice's current list size plus 10% growth in line with the guidance in *Health Building Notes 11*. As such, the proposed new surgery would cater for just over 14,400 patients in ideal conditions; given that at present we are delivering a service to almost that number in less than 30% of the recommended space, the practice are confident we could accommodate more patients in future if required.

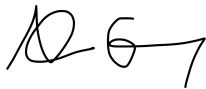
Conclusion

Park Road Surgery are in urgent need of a new building to accommodate what is the second-largest list in the borough, and that need is recognised by the CCG, by NHS England, by the Council's planning department (who acknowledged our need at a concept meeting on a different site), and by our patients. We regard the proposed Udney Park development as offering an outstanding opportunity to deliver a state-of-the-art new GP surgery, fit for the needs of our patients, in conjunction with the residential and sporting components of the development. We would also highlight that, despite eight years of looking, and extensive discussions with landlords, developers, and LBRuT itself about alternative sites, this is the only option open to the practice. We cannot continue caring for 10,000 additional patients indefinitely, and we cannot wait any longer for options which have failed to bear any fruit over the past eight years.

Our need is urgent and immediate, and we urge the planners to approve the development on behalf of the practice and the healthcare needs of our 13,000 patients.

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Yours sincerely,

A handwritten signature in black ink, appearing to read 'N Grundy', written in a cursive style.

Dr. Nicholas Grundy

APPENDIX 2 – RELEVANT PLANNING POLICIES

Sport Facilities			
Adopted London Plan (2016)	Draft London Plan (2017)	Adopted Development Management Plan (2011) and Core Strategy (2009)	Local Plan Review (2017)
<p>Policy 2.18 Green Infrastructure: The Multi-Functional Network of Green and Open Space</p> <p>The Mayor will work with all relevant strategic partners to protect, promote, expand and manage the extent and quality of, and access to, London's network of Green Infrastructure. This multifunctional network will secure benefits including, but not limited to, biodiversity; natural and historic landscapes; cultural; building a sense of place; the economy; sport; recreation; local food production; mitigating and adapting to climate change; water management; and the social benefits that promote individuals and community health and well-being.</p>	<p>Policy S4 Play Space and Informal Recreation</p> <p>Development proposals for schemes that are likely to be used by children and young people should:</p> <ol style="list-style-type: none"> 1. Increase opportunities for play and informal recreation and enable children and young people to be independently mobile. 2. For residential developments, incorporate good quality, accessible play provision for all ages, of at least 10 square meters per child that: <ol style="list-style-type: none"> a. Provides a stimulating environment b. Can be accessed safely from the street by children and young people independently c. Forms an integral part of the surrounding neighbourhood d. Incorporates trees and/or forms of greenery. 3. Incorporate accessible routes for children and young people to existing play provision, schools and youth centre, within the local area, that enable them to play and 	<p>Core Strategy (2009) Policy CP10 Open Land and Parks</p> <p>The Borough's Green Belt, metropolitan open land and other open land of townscape importance, World Heritage Site (Royal Botanical Gardens, Kew), land on the Register of Parks and Gardens of Special Historic Interest, green chains and green corridors will be safeguarded and improved for biodiversity, sport and recreation and heritage, and for visual reasons.</p> <p>Development Management Plan (2011) Policy DMOS6 Public Open Space</p> <p>Public open space will be protected and enhanced. Improvement of the openness and character of the Public Open Space including measures to allow for convenient access for all residents will be encouraged where appropriate.</p> <p>New Public Open Space will convenient access for all will be provided with public open space. These will be required for most new developments towards the provision of, or improvements to public</p>	<p>Policy LP31 Public Open Space, Play Space, Sport and Recreation</p> <p>Public open space, children's and young people's play facilities as well as formal and informal sports grounds and playing fields will be protected, and where possible enhanced. Improvements of existing facilities and spaces, including their openness and character and their accessibility and linkages, will be encouraged.</p> <p>New open spaces, play facilities and formal and informal land for sport and recreation should be linked to the wider Green Infrastructure network as they play an important role in creating social cohesion, encouraging and promoting healthier and more active lifestyles.</p> <p>The Council will require all major development proposals in the borough to meet the Public Open Space and play space needs arising out of the development by requiring the following:</p> <ol style="list-style-type: none"> 1. Public Open Space: applicants should provide an analysis of existing open space provision

	<p>move around their local neighbourhood safely and independently</p> <p>4. For large scale public realm developments, incorporating incidental play space to make the space more playable.</p> <p>5. Not result in the net loss of play provision, unless it can be demonstrated that there is no ongoing or future demand.</p>	<p>open space.</p> <p>Larger new developments will be expected to include open space provision within the scheme, with the aim to strike a balance between private, semi-private and public open space provision.</p> <p>Development Management Plan (2011) Policy DMOS7 Children's and Young People's Play Facilities</p> <p>Children's and young people's play facilities will be protected, and the improvement and enhancement of existing facilities and their accessibility will be encouraged. New children's and young people's play facilities will be provided, or existing spaces enhanced where possible, particularly in areas poorly provided with play facilities.</p> <p>New developments must assess the needs arising from the new development by following the benchmark standards outlined in the Mayor's SPG on Providing for Children and Young People's Play and Informal Recreation.</p> <p>All developments with an estimated child occupancy of ten children or more should seek to make appropriate play provision to meet the needs arising from the development. Where</p>	<p>in line with the Council's accessibility standards for travel to open spaces. Where there is inadequate existing provision and limited access to such facilities, publicly accessible facilities will be expected on site to mitigate the impacts of the new development on existing provision.</p> <p>2. Play Space: applicants should provide a play and child occupancy assessment to determine whether the proposal will lead to an estimated child occupancy of ten children or more, by using the Council's child yield calculator as set out in the Planning Obligations SPD. In addition, an assessment of existing play facilities within the surrounding area will be required. Where the assessment demonstrated an estimated child occupancy of ten children or more, the development proposal should</p>
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		<p>this provision cannot be met on-site or for developments yielding less than 10 children, the Council will seek an equivalent financial contribution to fund off-site provision.</p>	<p>make appropriate and adequate provision of dedicated on-site play space by following the London Plan benchmark standard of 10sqm per child. The Council will seek to integrate new major development within existing village areas and neighbourhoods . Therefore, new dedicated on site play space should be made publicly accessible.</p> <p>Where on-site provision of Public Open Space or play space is not feasible or practicable, the Council will expect existing surrounding facilities and spaces to be improved and made more accessible to the users and occupiers of the new development through, for example, improved walking and cycling links or enhancements of play space facilities. Financial contributions will be required to either fund off-site provision, or improvements and enhancements of existing facilities, including access arrangements, to mitigate the impacts of new development.</p> <p>Paragraph 8.4.18 states The Council will resist the loss of a playing field unless the proposal</p>
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			<p>meets the exceptional circumstance test as set out in the Sport England Policy. Where a proposal involves the loss, or impact on the size or quality, of a playing pitch, the applicant has to submit a full assessment demonstrating how the relevant guidance, policies and criteria have been addressed. There is also an exception that overall the development will deliver an increase and enhancement of sports facilities, provision of wider public benefits, including public access, and therefore enabling and promoting physical activity and encouraging healthier lifestyles and habits for all ages.</p>
<p>Policy 3.19 'Sports Facilities'</p> <p>The Mayors Sports Legacy Plan aims to increase participation in, and tackle inequality of access to, sport and physical activity in London particularly amongst groups/areas with low levels of participation.</p> <p>Development proposals that increase or enhance the provision of sports and recreation facilities will be supported. Proposals that result in a net loss of sports and recreation facilities, including playing fields, should be resisted. Temporary facilities may provide the means of mitigating any loss as part of proposals for permanent re-provision. Wherever possible, multi-use public</p>	<p>Policy G4 Local Green and Open Space</p> <p>Local green and open space should be protected</p> <p>The creation of new areas of publicly-accessible green and open space should be supported, especially, in areas of deficiency in access to public open space.</p> <p>Boroughs should undertake a needs assessment of local green and open space to inform policy. Assessments should identify areas of public green and open space deficiency.</p> <p>The loss of green and open spaces should be resisted in areas of deficiency. If losses are</p>	<p>Development Management Plan (2011) Policy DMOS8 Sport and Recreation Facilities</p> <p>Public and private sports grounds including playing fields and recreational areas, courts and greens as well as private open space in recreational uses will be protected and enhanced. Owners of private facilities will be encouraged to make them available for public access and use.</p>	

<p>facilities for sport and recreational activity should be encouraged. The provision of sports lighting should be supported in areas where there is an identified need for sports facilities to increase sports participation opportunities, unless the sports lighting gives rise to demonstrable harm to local community or biodiversity.</p> <p>Where sports facility developments are proposed on existing open space, they will need to be considered carefully in light of policies on Green Belt and protecting Open Space as well as the borough's own assessment of needs and opportunities for both sports facilities and for green multifunctional open space.</p>	<p>proposed outside of areas of deficiency equivalent or better quality provision should be made within the local catchment area unless an up-to-date need assessment demonstrates this is unnecessary.</p>		
<p>Policy 4.6 Support for and Enhancement of Arts, Culture, Sport and Entertainment</p> <p>The Mayor will and boroughs and other stakeholders should support the continued success of London's diverse range of arts, cultural, professional sporting and entertainment enterprises and the cultural, social and economic benefits that they offer to its residents, workers and visitors.</p>	<p>Policy S5 Sports and Recreation Facilities</p> <p>In order to ensure there is sufficient supply of good quality sports and recreation facilities, boroughs should:</p> <ol style="list-style-type: none"> 1. Regularly assess the need for sports and recreation facilities at the local and sub-regional level 2. Secure sites for a range of sports and recreational facilities 3. Maintain and promote the Walk London Network and encourage networks for walking, cycling and other activities. <p>Development proposals for sports and recreation facilities should:</p> <ol style="list-style-type: none"> 1. Increase or enhance the provision of facilities in accessible locations, well-connected to public transport and link 	<p>Development Management Plan (2011) Policy DMOS9 Floodlighting</p> <p>Floodlighting of sports pitches, courts and historic and other architectural features will be permitted unless there is demonstrable harm to character, biodiversity or residential amenity.</p> <p>Paragraph 4.1.29 states: Sports grounds and playing fields, games pitches, courts and outdoor swimming pools, including the many private facilities, provide facilities for Borough needs and assist towards meeting the wider sports needs of other Boroughs. They also, by their openness make a</p>	

	<p>to networks for walking and cycling</p> <p>2. Maximise the multiple use of facilities, and encourage the co-location of services between sports providers, schools, colleges and other community facilities</p> <p>3. Support the provision of sports lighting within reasonable hours where there is an identified need for sports facilities and lighting is required to increase their potential usage, unless the lighting gives rise to demonstrable harm to the local community or biodiversity.</p> <p>4. Ensure that there is no net loss of facilities, unless it can be demonstrated that there is no ongoing or future demand.</p> <p>Where facilities are proposed on existing open space, boroughs should consider these in light of policies on protecting open space and the borough's own assessment of needs and opportunities for sports facilities, and the potential impact that the development will have.</p>	<p>significant contribution to the townscape and natural environment. Paragraph 4.1.30 states: The Borough's Needs Assessment takes account population trends, such as an ageing population as well as changing levels of participation. There is evidence that a shortfall exists in the number of pitches available for some sports at peak times. It is therefore important that the recreational opportunities afforded by both public and private open sports facilities and their open character are not lost without good reason. The fact that playing fields have become disused is not sufficient reason to allow the use to be lost permanently or be a justification for building on them. Gaining more public access to private facilities and school/educational establishments will allow higher levels of participation in recreation and ease pressures on public facilities at times of peak demand.</p>	
<p>Policy 7.18 Protecting Open Space and Addressing Deficiency</p> <p>The Mayor supports the creation of new open spaces in London to ensure satisfactory levels of local provision to address areas of deficiency.</p> <p>The loss of protected open spaces must be resisted</p>			

<p>unless equivalent or better quality provision is made within the local catchment area. Replacement of one type of open space with another is unacceptable unless an up to date needs assessment shows that this would be appropriate.</p>			
C2 Elderly / Extra Care Accommodation Policies			
Adopted London Plan (2016)	Draft London Plan (2017)	Adopted Development Management Plan (2011) and Core Strategy (2009)	Local Plan Review (2017)
<p>Policy 3.5 Quality and Design of Housing Development</p> <p>The design of all new housing developments should enhance the quality of local places, taking into account physical context; local character; density; tenure and land use mix; and relationships with, and provision of, public, communal and open spaces, taking particular account of the needs of children, disabled and older people.</p>	<p>Policy H15 Specialist Older Person Housing</p> <p>Boroughs should work positively and collaboratively with providers to identify sites which may be suitable for specialist older persons housing taking account of:</p> <ol style="list-style-type: none"> 1. Local and strategic housing needs information and the indicative benchmarks 2. The need for sites to be well connected in terms of contributing to an inclusive neighbourhood, access to social infrastructure, health care and public transport facilities. 3. The increasing need for accommodation suitable for people with dementia. <p>Specialist older person housing (Class C3) should deliver:</p> <ol style="list-style-type: none"> 1. Affordable housing in accordance with Policy H5 and Policy H6 2. Accessible housing in accordance with 	<p>Development Management Plan (2011) Policy DMH05 Housing to Meet Specific Community Needs</p> <p>The loss of existing housing will be resisted where it meets identified specific community needs, unless it can be shown that:</p> <ul style="list-style-type: none"> - The accommodation is no longer needed, or - That the existing accommodation will be adequately re-provided to an equivalent or greater standard in a different way or elsewhere, or - The new accommodation will instead meet another identified priority local need. <p>Planning permission will be granted for new accommodation where housing is providing for an identified local need,</p>	<p>Policy LP30 Health and Well Being</p> <p>The Council will support development that results in a pattern of land uses and facilities that encourage an inclusive development layout and public realm that considers the needs of all, including the older population and disabled people.</p>

	<p>Policy D5</p> <ol style="list-style-type: none"> 3. The highest standards of accessible and inclusive design in accordance with Policy D3 4. Suitable levels of safe storage and charging facilities for residents' mobility scooters 5. Pick up and drop off facilities close to the principal entrance suitable for taxis (with appropriate kerbs) minibuses and ambulances. 	<p>across a range of tenures, providing they are on site and in a location suitable for that particular use, and in accordance with other environmental transport, parking and other relevant policies.</p>	
<p>Policy 3.8 Housing Choice</p> <p>Account is taken of the changing age structure of London's population and, in particular, the varied needs of older Londoners including for supported and affordable provision.</p>	<p>Policy SD6 Town Centre</p> <p>The particular sustainability of town centres for smaller households, Build to Rent, older people's housing and student accommodation should be considered and encouraged.</p> <p>The delivery of a barrier free and inclusive town centre environment that meets the needs of all Londoners, including disabled and older Londoners and families with younger children, should be provided. This may include Shopmobility schemes, the provision of suitably designed crossing points, dropped kerbs and tactile paving, seating and public toilets.</p>		
	<p>Policy D4 Housing Quality and Standards</p> <p>New homes should have adequately sized rooms and convenient and efficient rooms layout which are functional, fit for purpose and meet the changing needs of</p>		

	<p>Londoners over their lifetimes. Particularly account should be taken of the needs of children, disabled and older people.</p>		
	<p>Policy D5 Accessible Housing</p> <p>To provide suitable housing and genuine choice for Londons diverse population, including disabled people, older people and families with young children, residential development must ensure that:</p> <ul style="list-style-type: none"> a. At least 10% of new build dwellings meet Building Regulations requirement M4(3) 'wheelchair user dwellings' i.e. designed to be wheelchair accessible, or easily adaptable for residents who are wheel chair users <p>All other new build dwellings meet Building Regulations requirement M4(2) accessible and adaptable dwellings.</p>		