

## **PLANNING STATEMENT**

**in support of an application for Full Planning Permission for the following development:**

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**Demolition of all existing buildings; erection of two 3-storey buildings comprising 30 residential dwellings in total (6 x 1 bedroom, 17 x 2 bedroom & 7 x 3 bedroom); erection of single storey nursery building (294 sqm in total) alterations to existing access and formation of 36 no. car parking spaces at grade; landscaping including communal amenity space and ecological enhancement area; secure cycle and refuse storage structures.**

**At the Strathmore Centre and Scamps Nursery, Strathmore Road, Teddington, TW11 9UH**

**Robin Harper BA (Hons) Dip UD MSc Cons IHBC MRTPI  
Chartered Town Planner**

**FEBRUARY 2020**

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## 1. INTRODUCTION

### Terms of Reference

- 1.1 Harper Planning Consultants Ltd. has been instructed by PA Housing to prepare a Planning Statement in support of an application for full planning permission for the demolition and redevelopment of the Strathmore Centre and Scamps Nursery to provide 30 new residential dwellings comprising 100 per cent affordable housing and a new day nursery building.

### Background

- 1.2 The application site is shown edged in red on the Site Location Plan and comprises 6228 sqm in total. The site falls within the definition of 'previously developed land' and is included on the Brownfield Land Register published by the Greater London Authority.
- 1.3 The site is currently occupied by several buildings (i) The Strathmore Centre – a part single-, part two-storey, building at the front of the site facing onto Strathmore Road and (ii) Scamps Nursery– a single-storey building at the rear of the site and; three single-storey portacabin buildings situated along the western boundary of the site.
- 1.4 Scamps Nursery provides a range of pre- and after-school child-care services for children up to and including Year 6, as well as a day nursery for pre-school children. The Strathmore Centre is vacant and the temporary 'portacabin' buildings are derelict.
- 1.5 The new Local Plan 2018 designates the site as Site Allocation SA 7. The proposed mixed use development for affordable housing and new day nursery is supported by evidence demonstrating that 'other alternative social or community infrastructure uses' have been explored and options discounted'.
- 1.6 The application site falls within the ownership of the London Borough of Richmond upon Thames. On 15<sup>th</sup> March 2018, the Council's Cabinet Members approved the following recommendations for the site:

*“(a) The site is formally declared as being surplus to the Council's operational requirements;*  
*(b) Officers finalise the design of the nursery and then agree terms with SCAMPS for their new lease at a market rent;*  
*(c) Paragon be asked to progress its design and submit a final offer to the Council that is then independently assessed by the Council's valuers;*  
*(d) That the Joint Deputy Leader – Environment, Business and Community, in consultation with the Assistant Director, Property Services, is given delegated approval to agree terms and conclude the sale of the land provided that the terms proposed represent market value (reflecting the restriction on the sites use to affordable housing).”*

- 1.7 This application seeks re-provision on the day nursery within new purpose-built facilities to meet current and future needs of the existing operator (Scamps) and to optimise the development potential of the remainder of the site to meet an urgent identified local need for affordable housing.
- 1.8 Redevelopment of the site has been the subject of extensive pre-application consultation with officers from the Planning, Highways and Housing Departments as well as Scamps Nursery, Stanley School, ward councillors and the local community. The officers' written pre-application responses are considered as part of this statement and confirm that the applicant has engaged in a positive and proactive dialogue with the local planning authority, as recommended by national planning policy.
- 1.9 PA Housing is currently finalising negotiations with the Council for the purchase of the site subject to provisions relating to the form and tenure of affordable housing as well as the provision of replacement accommodation on-site for SCAMPS children's nursery. Heads of Terms have now been agreed for the acquisition of the site from the Council including the form and tenure of affordable housing.
- 1.10 The application is supported by the following drawings:

<b>Drawing No.</b>	<b>Title</b>	<b>Scale</b>	<b>Prepared by</b>
OD101	Block and Site Plan	1:1250 @ A2	Living Architects
OD103B	Scamps GF Plan	1:50 @ A1	Living Architects
OD104A	Scamps Elevations	1:50 @ A1	Living Architects
OD105	Scamps Sections	1:50 @ A1	Living Architects
OD113	Scamps Roof Plan	1:50 @ A1	Living Architects
OD200J	Residential Ground Floor Plan	1 : 200 @ A1	Living Architects
OD201E	Residential First Floor Plan	1 : 200 @ A1	Living Architects
OD202F	Residential Second Floor Plan	1 : 200 @ A1	Living Architects
OD203G	Residential Roof Plan	1 : 200 @ A1	Living Architects
OD204J	Residential Elevations 1	As noted	Living Architects
OD205G	Residential Elevations 2	As noted	Living Architects
1001/X01	Location Plan	1 : 1250 @ A4	Living Architects
1001/X02A	Site Survey Plan	As noted	Twickenham Surveys
1001/X03	Site Survey Elevations	As noted	Twickenham Surveys

1.11 The application is also supported by the following technical reports and surveys:

Document	Prepared by
Planning Statement incorporating Statement of Community Engagement and s106 draft Heads of Terms	Harper Planning Consultants
Community Infrastructure Levy (CIL) information	Harper Planning Consultants
Design and Access Statement	Living Architects
Transport Assessment including Parking Survey	SW Transport Planning Limited
SUDS	Eight Associates
Preliminary Ecological Assessment	ACD Environmental
Sunlight and Daylight Assessment	Herrington Consulting Limited
Tree Survey Plan & Schedule	ACS Trees
Preliminary Arboricultural Report	ACS Trees
Landscape Masterplan	ACS Environmental
Noise Impact Assessment	KP Acoustics
Preliminary Risk Assessment	Wiser Environment
BREEAM NC Pre-assessment	SRE
Energy and Sustainability Assessment including LBRuT Sustainability Checklist	SRE
Building Performance Specification and SAPS summary report	SRE

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## **Content**

- 1.12 This statement provides an overview of the planning context applicable to the site and is structured as follows:

<b>Section 1</b>	<b>Introduction</b>
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<b>Section 3</b>	<b>Relevant Planning History</b>
<b>Section 4</b>	<b>Pre-Application Consultation</b>
<b>Section 5</b>	<b>Application Proposal</b>
<b>Section 6</b>	<b>Planning Policy Framework</b>
<b>Section 7</b>	<b>Key Planning Considerations</b>
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## **List of Appendices**

<b>Appendix One</b>	<b>Richmond Council Cabinet Disposal Report 2018</b>
<b>Appendix Two</b>	<b>Officer's report on Stanley School Expansion</b>
<b>Appendix Three</b>	<b>Pre-application Responses</b>
<b>Appendix Four</b>	<b>Richmond Design Panel Response</b>
<b>Appendix Five</b>	<b>Public Exhibition Information</b>
<b>Appendix Six</b>	<b>Supporting Statement from Richmond Estates Department</b>

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## **SITE AND SURROUNDINGS**

### **The Site**

- 2.1 This application relates to a wedged-shaped site at the rear of Stanley Road, Shacklegate Lane and Strathmore Road (east) and fronting onto Strathmore Road (north). The site's main axis is north/south. It is relatively flat and comprises 0.62 ha in total.
- 2.2 Historic Ordnance Survey maps indicate that the site was first developed as a school (Strathmore School) and youth training centre in the late 1960s or early 1970s. There is no evidence of any substantial buildings on the site prior to this development. The Preliminary Risk Assessment submitted with the application confirms that the site has undergone limited historical development and functioned as allotment gardens before Strathmore School was constructed in around 1963. Previous land uses include a garage used as storage for car maintenance classes from 1974.
- 2.3 The site is currently occupied by several buildings. The Strathmore Centre is a part single-, part two-storey building constructed in the late 1960s. It has a utilitarian design typical of this period – in part brick-faced fronting onto Strathmore Road and in part constructed in exposed concrete frame with rendered infill panels. The rear building day nursery building is single-storey. It has a prefabricated 'porta-cabin' appearance with high level slotted windows. Both buildings have flat roofs behind raised parapets. There are also three temporary portacabins sited between the Strathmore Centre and day nursery which were installed for building contractors as part of the Stanley School expansion project. There is also an electricity sub-station on the south east boundary of the site.
- 2.4 The site access road runs along the eastern boundary with an informal parking area between the two main buildings. Currently, the access road also provides unrestricted parking for approximately 29 cars. The site access road feeds onto Strathmore Road opposite the entrance to Stanley School - this part of Strathmore Road is 'one-way' accessed from Shacklegate Lane and exiting onto Stanley Road.
- 2.5 There are several trees on the site including three mature trees at the entrance to the site, a clump of silver birch trees adjacent to No.67 Strathmore Road, a conifer hedge between building (A) and (B) and a mature (walnut) tree in front of building (B). The application is accompanied by a tree survey and schedule which identifies all significant trees on the site.

### **Existing Uses**

- 2.6 For the purpose of assessing the merits of the proposals, the subject of this application, against the applicable planning policy context, the entire site is considered to fall within Use Class D1 (non-residential institution). The Strathmore Centre has been vacant for several years. The day nursery is occupied by Scamps - a non-profit making company – providing day nursery and after school childcare. It offers the following provision:

**Breakfast Club** - Open from 7am – 9am to all children attending Stanley Primary or St James's Schools. Children are walked to school for the start of the school day.

Maximum occupancy 68 places

Monday	Tuesday	Wednesday	Thursday	Friday
36	30	31	41	18

**Little Scamps** - Open term times from 9am - 12.15pm for children aged 2 years to rising fives.

Maximum occupancy 30 places

Monday	Tuesday	Wednesday	Thursday	Friday
23	19	23	21	15

### Wraparound

Pupils are collected at lunch times from Stanley or St James's Nursery or carry-on for the afternoon after Little Scamps- opens from 12 noon - 3pm.

Maximum occupancy 30 places

Monday	Tuesday	Wednesday	Thursday	Friday
2	8	8	8	closed

**After School** - Open from 3.10pm to children attending Stanley and St James's Schools collected from school and available until 6.30pm

Maximum occupancy 30 places

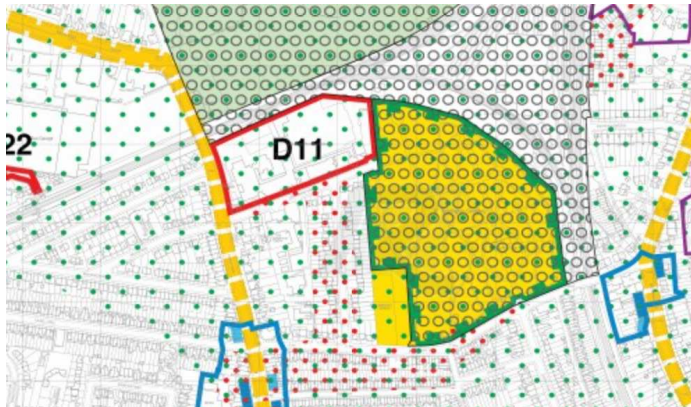
Monday	Tuesday	Wednesday	Thursday	Friday
56	60	68	54	26

**Holiday Club** - Available for children aged 3-12 years in school holidays and run from Stanley School

### Development Plan Designation

2.7 The site falls within the London Borough of Richmond upon Thames and the relevant local planning policy context is set in the London Plan (2016) and the Richmond upon Thames Local Plan (2018) as well as the Local Plan Policies Map. The site does not lie within a conservation area or other area of environmental protection and there are no designated or non-designated heritage assets on or adjacent to the site.

2.8 An extract from the Local Plan Proposals Map (below) shows that the site, in part, falls within an area poorly provided with Public Open Space and adjacent to an area proposed for Tree Planting. It is on the Council's Brownfield Land Register and has a 'Site Allocation' within the Local Plan (SA 7).



*Extract from Richmond upon Thames Local Plan Proposals Map*

### **The Surrounding Area**

- 2.9 The application site is situated to the rear of Strathmore Road, Stanley Road and Shacklegate Lane with the site fronting on the north side onto Strathmore Road. The site lies within a predominantly residential area of north Teddington, with properties No. 9-63 Strathmore Road bordering the east boundary of the site, the flats at 1-8 Birdwood Close adjoining the south boundary, and No. 214-232 Stanley Road adjoining the west boundary. Stanley Primary school is situated opposite the site to the north, in Strathmore Road.
- 2.10 The prevailing form of development in the area is semi-detached, detached houses or terraced houses. However, there are some larger scale buildings in the area including Stanley Junior School and the Strathmore Centre. The prevailing height and scale of development in the locality is two and three storey dwellings.
- 2.11 The architectural character and style of the locality is mixed. The area surrounding the site includes 19<sup>th</sup> and early 20<sup>th</sup> century terraces and semi-detached houses with later 20<sup>th</sup> century infill development in various architectural styles.

### **Borough Character Study**

- 2.12 In accordance with the recommendations of the National Planning Policy Framework (NPPF), Richmond Council has undertaken characterisation studies of the borough to identify the different local townscape characteristics of their area.
- 2.13 The application site lies within Fulwell and Hampton Hill ward situated in the west of the borough and falls within the boundary of the Hampton Wick and Teddington Village Plan and within Character Area 1: Stanley Road North. The area straddles the northern part of Stanley Road, an established shopping area. The character area is broadly defined by terraced housing in a mixture of styles. The character study describes the dominant materials and features of the areas as follows:



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*“Characteristic features and materials include: mixed stock brick with red brick dressings, canted and bay windows, flat roofs, contemporary brickwork palette, red brick, render, pitched roofs with clay tiles, slate roofs and sash windows.”*

**Public Transport Accessibility**

- 2.14 The application site is located approximately 250 metres walking distance from Stanley Road local shopping centre which provides a range of shops and local services. Lidl supermarket (opening summer 2020) Squires garden centre and Hampton Road local shopping parade are located approximately 500 metres to the northwest of the site. Several local bus routes run along Stanley Road and the site lies within easy walking distance of Fulwell mainline railway station. A detailed assessment of the site's accessibility is set out in the Transport Assessment prepared by SWTP Limited.

### 3. RELEVANT PLANNING HISTORY

3.1 The planning history of an application site is relevant to consideration of an application for planning permission because it may establish the lawful or authorised use of the buildings or land, and in the case of an extant permission, confirm the acceptability of certain issues in respect of alternative development proposals for the site. Planning case law has confirmed that the planning history of the site may also be significant in the context of consistency in decision-making. Although each application must be assessed 'on its own merits' having regard to all material considerations, similar issues need to be decided by local planning authorities in a consistent manner.

3.2 On the basis of online information available on Richmond upon Thames Planning Register, the planning history relevant to consideration of the current proposals is summarised below:

#### The Strathmore Centre

Application Number	Status	Proposal
02/1951	Granted permission 18/07/2002	Erection of 2 relocatable office buildings and associated access ramps and railings.
99/1475	Granted permission 13/09/1999	Erect demountable classroom in grounds of the Strathmore Centre as an additional teaching block and for use as an out of schools and holiday playgroup facility.

#### Youth Centre Strathmore Road (Scamps Nursery)

Application Number	Status	Proposal
83/0938	Granted permission 26/09/1983	Use of premises as playgroup 9am to 12.30pm Monday to Friday for up to 32 children (variation of condition (b) of permission no.81/1291).
81/1291	Granted permission 20/11/1981	Use of premises as playgroup 9am to 12.30pm Monday to Friday for 20 children.
80/1521	Granted permission 08/01/1981	Extension to main hall.
78/1041	Granted permission 04/01/1979	Use of premises for playgroup purposes from 9am to 12.30pm Monday to Friday for 20 children.
77/0819	Granted permission 10/10/1977	Use of premises for playgroup purposes from 9am to 12.30pm Monday to Friday for 20 children.
74/0196	Granted permission 11/07/1974	Erection of a garage for storage purposes in connection with the car maintenance classes.
70/2378	Granted permission 01/02/1971	Erection of 12ft high wire mesh fence.

#### Stanley Infant and Junior School

3.3 Permission was granted in 2010 for amalgamation and expansion of two existing three form entry schools, Stanley Infants School and Stanley Junior School to form a combined four form entry Primary School with the addition of an Autistic Spectrum Unit and a Children's Centre to include new build accommodation and reconfiguration of existing areas. A number of non-school

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community activities also occur on the site including use of the grass pitch, MUGAs and other parts of the school.

- 3.4 The officer's report in respect of the school expansion scheme notes *"a contemporary design approach is being pursued with similar materials to the existing, brick, but of a different colour, blue/brown is suggested. The contrast is intended to demonstrate another phase in the continuing development of the site overtime."* *"It is noted that the proposal is different to the main school in term of the new distinctive design although in terms of scale it reflects the size of the main existing complex."*

*The officer's report notes under-provision of staff parking on-site but suggests that "staff car parking will be during the day whereas resident parking is more likely in the evening periods. There is thus a degree of 'duel' use of the street parking."*

#### **Summary**

- 3.5 The Strathmore Centre was previously used by Richmond Social Services and as a Youth Offending Centre. These services closed several years ago as they were no longer required for this purpose or any other purpose that could be identified by the Council. Therefore, the buildings have remained vacant (apart from the SCAMP's nursery building) for over 9 years and declared surplus to requirements.
- 3.6 Permission was granted in the 1980s for the single-storey building at the rear of the site to be used as playgroup for up to 32 children, between 9am to 12.30pm Monday to Friday. Since then, the nursery and after-school provision in the building has expanded to such an extent that the current operation by Scamps does not fall within the restrictions imposed by that permission.
- 3.7 It is noted that the 1980s permission for change of use of the building did not include any ancillary parking provision for staff or parents and the current use is not subject to any planning restrictions in terms of in terms numbers of children, hours of operation or travel plan.

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## **PRE-APPLICATION CONSULTATION**

### **Pre-application Submissions**

- 4.1 In accordance with the national planning guidance, the applicant and project design team have undertaken extensive pre-application consultation with the Local Planning Authority (LPA), key stakeholders including ward councillors, Scamps nursery, Stanley School and the local community.
- 4.2 PA Housing has engaged in extensive pre-application consultation with the LPA through its formal pre-application process over a considerable period of time, as well as Richmond's Housing and Highways Departments, in order to resolve as many issues as possible prior to submission of the application. The proposals have been the subject of formal two-stage pre-application consultation with Richmond Planning Department to facilitate in-depth discussions on all relevant issues prior to submission of the application. Additional pre-application consultation was undertaken with Richmond Design Review Panel.
- 4.3 Detailed face-to-face discussions with officers have facilitated early consideration and agreement of the fundamental issues relating to development principles – notably loss of the existing social use, the principle of mixed use development comprising replacement nursery provision and 100 per cent affordable housing, scale and density of development and the proposed mix of residential units.
- 4.4 PA Housing has responded positively to the officers' comments to ensure the scheme is policy compliant and the application submission (including supporting documents) addresses fully all matters raised during the extensive pre-application process. The officers' pre-application responses are appended to this Statement (Appendix Two).

### **Initial Pre-application Submission (September 2018)**

- 4.5 The initial scheme proposed the erection of two 3-storey apartment blocks (comprising 8 x 1 bed, 27 x 2 bed and 6 x 3 bed units in total), and 2 x 4 bed semi-detached houses as well as the erection of a single-storey building (re-provision of Scamps nursery accommodation) fronting onto Strathmore Road; alterations to the existing vehicular access arrangements, provision of 46 residential car parking spaces and 2 nursery spaces (including 9 disabled parking spaces).
- 4.6 The brief for the proposed layout and design of the nursery building was provided by Richmond Council Estates Department on the basis of a specification agreed with Scamps. The LPA's response to the initial pre-application submission was issued in October 2018 and is appended to this Statement

### **Revised Pre-application Submission (February 2019)**

- 4.7 A second pre-application scheme comprising 33 affordable dwellings was submitted in February 2019 responds to the LPA's initial comments as follows:

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*Form and Design - Frontage Block*

- 4.8 Concern was raised about the form and design of the infill block fronting Strathmore Road - officers suggested bringing the building forward and increasing the width and depth of this block. The width of block A has been increased to the maximum potential width between the root protection zone of the adjacent group of trees (T30, T31 and T32) and the flank wall of neighbouring building to the west.
- 4.9 The block has been brought forward in line with the established building line whilst maintaining small front gardens to provide defensible space/privacy buffer to the ground floor flats. The possibility of increasing the depth of this block was considered but was discounted as it would result in the creation of a significant number of single aspect north facing dwellings fronting Strathmore Road.

*Siting and Design - Central Block*

- 4.10 Officers recommended a number of changes to the central block which were addressed in the revised scheme as follows:

*“The length of the block is broken up into two – (no longer than the length of a terrace within Strathmore Road). The massing of the building is reduced through materials (however officer suggest no more than 3), setbacks and vertical detailing.”*

- 4.11 Response – The length of the block has been reduced and the massing has been broken up into three elements linked by recessed stair cores.

*“The height is reduced to mostly two storeys. Subject to the unneighbourly concerns being addressed, there could be a possibility of a second floor, however, this should be much more modest, set in from elevations, and be punctuated on the building rather than the building being wholly a three-storey block.”*

- 4.12 Response - The block comprises two-storeys to eaves level with additional accommodation within the roof form. The second floor accommodation is set back from the main street frontages. The building is not wholly a three-storey block.

*“To ensure the elevations do not appear ‘flat’ there should be decent reveals to fenestration (no less than 150mm) and framing;”*

- 4.13 Response – The main elevations are well articulated with projecting bays and set-backs. The fenestration will include window reveals as recommended.

*“The under crofts are not successful architectural features, result in ‘dead frontages’ at ground level and should be omitted.”*

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- 4.14 Response – The undercroft has been omitted – all street frontages are overlooked by habitable room windows.

*Siting and Design - Replacement Nursery*

- 4.15 Concerns were raised about the scale of the residential block sited at the rear of the site (currently occupied by the single-storey nursery building) and its potential impact on neighbouring residential amenity. In response, the revised scheme incorporates the replacement nursery in the existing position at the rear of the site. The proposed single-storey nursery building does not give rise to any adverse impact on neighbouring amenity in terms of sunlight/daylight, loss of privacy or outlook.

*Housing Standards - NDSS*

- 4.16 The scheme provides 100% affordable housing in accordance with the requirements of Richmond Housing Department and PA Housing, and the officers' initial response noted that several units exceeded the NDSS minimum internal space standards. The revised layout provides the optimum floor areas for each having regard to efficiency and affordability in accordance with the client's instructions.

*Housing Standards - Privacy and Outlook*

- 4.17 The separation distance between the residential blocks has been increased to achieve 20 metres minimum between habitable room windows, as recommended. Windows on the north facing flank of the central block will be obscured to prevent direct overlooking to the rear of the Strathmore Road block. The separation distance between the rear elevation of the front block and north facing rear windows in the central block is now 50 metres plus.

*Community Amenity Space*

- 4.18 The communal amenity space has been relocated to the rear of the central block backing onto residential gardens of Stanley Road properties. The communal gardens and playground are directly accessible via rear access doors from all stair cores. The play space will be accessible, overlooked and secure for children.

- 4.19 The site is located approximately 200 metres from Strawberry Woods play area (opened July 2016). As such, the scheme is required to incorporate play provision for under fives. The revised scheme provides communal amenity space incorporating a playground in accordance with the Mayor's SPG Shaping Neighbourhoods: Play and Informal Recreation (September 2012) which sets maximum walking distances from residential units to play space for various age groups.

*Neighbouring Residential Amenity*

- 4.20 The revised scheme provides significant improvements to residential amenity in terms of the relationship of the proposed buildings to neighbouring properties. The central block is sited further away from the boundary to Stanley Road properties than the initial scheme and the rear residential block has been deleted. The minimum separation distance between the west elevation of the

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central block and rear elevation of no.224 Stanley Road would be 31.5 metres. The revised layout ensures that many trees on the boundary will now be retained providing additional screening and the boundary planting will provide an ecological area. The separation distance between the front elevation of the central block and the rear elevation of Strathmore Road (east) properties would be 24.8 metres.

#### *Transport, Car Parking*

- 4.21 The revised pre-application scheme retained the access road in its existing position on the eastern boundary. The access road design has been upgraded to adoptable standards i.e. 5.5m carriageway and 2.0m footway, 6.0m parking aisles, plus turning head for service vehicles.
- 4.22 The revised pre-application scheme provided 37 no. car parking spaces for the development including 8 no. disabled parking spaces. The disabled parking spaces are located close to the accessible flats. As recommended by officers, a parking survey was undertaken which confirms that existing on-street parking within the site relates to commuters or school staff/visitors rather than local residents. The revised pre-application scheme also incorporated 40 cycle parking spaces within two secure cycle shelters, as shown on the site plan.

#### *Pedestrian Environment*

- 4.23 The revised pre-application scheme addressed concerns about the lack of direct or continuous pavement throughout the development to each block and the nursery, and provides pedestrian access to the front and rear of the blocks.

#### *Tree Protection*

- 4.24 The revised layout retains the majority of significant trees having regard to other site constraints. In particular, the scheme retains the group of Norway Maples on the Strathmore Road frontage and the Red Oak (T18) and Beech (T21) on the western boundary would be incorporated in the communal amenity area. The mature Oak (T6) on the southern boundary would remain within the nursery play space.

#### **Consultation with Richmond Design Review Panel (July 2019)**

- 4.25 As recommended by planning officers, the applicant consulted Richmond's Design Review Panel, presenting the scheme to a selected panel on 18<sup>th</sup> July 2019. The Panel's detailed comments are summarised below:

- The Panel supported the proposal for 100% affordable homes on the site and whilst noting the overall reduction community facilities on the site, understood that the marketing of the existing Strathmore Centre for D1/D2 use had not been successful.
- Overall the distribution of height, massing and general arrangements of the buildings on site is supported by the Panel but had strong concerns over the siting of the Scamps Nursery.

- The Panel favoured the contemporary approach and given the area presents a mix of modern and traditional design elements supports the architectural articulation for the blocks. The Panel commended the very strong articulation of Block A, but felt the overall character of the development is missing as one enters the site.
- In relation to the detailing of the façades, the Panel questioned whether the fenestration could be slightly more refined and some concern over the materials palette proposed, and suggested a darker shade of zinc for the roofs.
- The Panel expressed concern about the separation of the design of the housing by one team, who presented to the Panel, and the design of Scamps by another team, who were not present at the review.
- The Panel understood the need for compliance with LBRuT parking standards and the desire to retain the existing on-street parking but encouraged further discussion with the highways department about the amount of car parking necessary.
- Given the Draft London Plan's desire to achieve 100% electric vehicle provision on new developments, the Panel encouraged the provision for more electric charging points.
- The Panel thought Block A was located too close to Strathmore Road and the tight strip of land wedged between Block A and the adjacent building on Strathmore Road reads as leftover space.
- The Panel discussed the possibility of the nursery having a green roof as a single storey building the roof would be overlooked by neighbouring dwellings.
- The Panel considered the landscape strategy to be well thought through with a sensible retention of the best trees, and the play strategy seems to be well considered and appealing to all abilities. However, the Panel encouraged reconsideration of the balance of the distribution of footways and parking on the access road, and greening of the access road.

4.26 Following receipt of the Design Panel's written comments and consideration by the Design Team, the scheme was amended to address some concerns raised by the Panel. In particular, in response to comments regarding the external elevations and architectural style, the scheme architects amended the detailed design of the residential blocks and were instructed to provide a consistent design for the nursery block.

4.27 The Panel's concerns regarding site layout and parking were addressed following the Council's confirmation that the site access was not adopted highway. The un-adopted status of the access road opportunity for further amendments to the scheme which address all outstanding issues raised by officers and the Design Review Panel. These amendments are summarized as follows:

- The access road layout and car parking provision amenity has been revised with the omission of public car parking on the site. The access road width has been increased to allow dual passage with residents parking along both sides. The revised layout also incorporates some visitor parking within the maximum parking standard.



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- The widened road layout now incorporates a planting bed along the full length of the pathway on the eastern boundary as well as 2 metres minimum pavement width.
  - The nursery drop-off area and turning head have been amended with car parking removed from the turning radius and loading area provided nearer the building – thereby addressing the highway safety concerns raised by the Design Review Panel.
  - Car parking spaces have been omitted between blocks A and B. Consequently, refuse storage areas have been relocated from the block B entrance areas to the space between block A and B – thereby addressing concerns raised by the Design Review Panel. This amendment has also facilitated the provision of an additional 3b family unit in block B in lieu of a 2b unit.
  - Block A have been re-sited slightly further back into the site and the gap between block A and the adjacent building has been increased.

### **Community Engagement**

- 4.28 Engagement with local residents and other key stakeholders is an important part of the design process and PA Housing are committed to community involvement at the appropriate stage prior to submission of an application to ensure that there is a genuine opportunity for feed-back inputting into the design development. The submission of this application follows a public exhibition where the local community were able to attend, view and discuss the proposals with members of the design team.
- 4.29 The community consultation has allowed local residents, ward councillors, community groups and other organisations to provide comments on the merits of the pre-submission scheme and identify any perceived shortcomings as well as express opinions on the strengths and weaknesses of the proposed development. All feed-back received from the local community has been analysed by the project team and incorporated in the design review process resulting in amendments which now form an integral part the application submission scheme.
- 4.30 PA Housing held a public exhibition of the draft pre-submission scheme on 26<sup>th</sup> November 2019 between 6.00pm and 8.30pm at Stanley Junior School. The exhibition display boards are appended to this Statement. Members of the design team including the scheme architects and representatives of PA Housing were available to discuss the proposals with local residents and members of community groups, and answer any questions regarding the scheme.
- 4.31 Local residents were encouraged to provide written comments on the proposals and feed-back forms were made available at the public meeting to assist in this process. The feed-back forms contained comment headings on key questions with an option for additional comments.

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4.32 A copy of the feed-back form that was provided at the exhibition is attached to this Statement. Members of the design team also recorded verbal feed-back received from residents during the exhibition.

4.33 Approximately 50 members of the local community attended the public exhibition and 21 feed-back forms were completed - 17 of the respondents were identified as residents who lived within the immediate vicinity of the site. Comments from members of the local community about the consultation scheme are summarised below:

*Highways/Parking*

- Traffic flow and congestion– increased volume of traffic and further restrictions imposed on parking
- Reduction in parking availability
- Highway safety

*Design*

- Height and massing
- Unattractive design
- Size of windows
- No public access to communal amenity space
- Outdoor space for Scamps

*Residential Amenity*

- Overlooking and overshadowing to neighbouring gardens
- Too close to rear of neighbouring properties
- Loss of views of trees and sky
- Loss of light and overshadowing to gardens
- Loss of privacy and light to neighbouring properties

*Other Issues*

- Affordability of rent for Scamps
- Pressure on local infrastructure – roads, parking, sewer system
- Increased noise and disturbance
- Construction impact – following on from Stanley School building works
- Security implications and potential anti-social behaviour

4.34 Following the public exhibition and review of the consultation responses by the design team, PA Housing undertook a thorough re-evaluation of the scheme. As a result of this review, the scheme was amended to address some concerns raised by the local community.

4.35 PA Housing undertook final consultation with highway officers to ensure the post-consultation proposals (the submission scheme) remained policy compliant. Accordingly, the application has

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been prepared and submitted following extensive consultation with the local authority and local community as recommended by the NPPF.

## 5. APPLICATION SUBMISSION

- 5.1 Demolition of all existing buildings; erection of two 3-storey buildings comprising 30 residential dwellings in total (6 x 1 bedroom, 17 x 2 bedroom & 7 x 3 bedroom); erection of single storey nursery building (294 sqm in total) alterations to existing access and formation of 36 no. car parking spaces at grade; landscaping including communal amenity space and ecological enhancement area; secure cycle and refuse storage structures.

### New Homes

- 5.2 The scheme seeks to provide an appropriate balance of unit sizes as envisaged by the borough Strategic Housing Market Assessment, having regard to the site constraints, local character of the surrounding area and the policy requirements to provide replacement nursery accommodation for Scamps and to optimise the residential development potential on the remainder of this brownfield site. The proposals will deliver 30 new affordable homes with a mix of one, two and three bedroom apartments.

### Size and Mix

- 5.3 The proposed size and mix of new homes is set out in the schedule of accommodation. The summary table below shows the

Size of Unit	Units	Proposed Mix
1-bedroom	6	20%
2-bedroom	17	57%
3-bedroom	7	23%

- 5.4 The scheme incorporates a balanced mix of dwelling sizes including 23% family-sized dwellings in general conformity with the requirements of Local Plan and SHMA – with an emphasis on 2-bedroom units as recommended by the Housing Department.

### Tenure

- 5.5 The proposed tenure split is 80% London Affordable Rent and 20% Shared Ownership. Units 1 – 6 in Block A (2 x 1b/2p and 4 x 2b/4p) are the proposed Shared Ownership units; units 7-12 in Block A and units 13-30 in Block B are proposed to be London Affordable Rent Units.

### Housing Quality

- 5.6 All new homes have been designed to meet or exceed the National Technical Housing Standards in terms of unit size (Gross Internal Area) and room sizes. All units are dual aspect and no more than 6 units will be accessed from each staircase.
- 5.7 Within the general building mix 10% (i.e. three) dwellings are intended as wheelchair housing standard in line with Approved Document Part M4(3) (i.e. ground floor units 18, 19 and 24.) These

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are 2 x 2 bedroom/3 person units and 1 x 2 bedroom/4 person unit. All other units are to be 'accessible and adaptable dwellings' to Approved Document Part M2 (2).

### **Residential Density**

- 5.8 The site area is 0.6 ha – the residential site area being 0.52 ha. The residential development density of the scheme is 58 dwellings per hectare (175 habitable rooms per hectare) compared to the London Plan Density Matrix recommended density range of 50 – 95 dwellings per hectare (150-250 hr/ha). As such, the scheme falls at the lower end of the density range recommended in the development Plan.

### **Architectural Design**

- 5.9 The applicant has adopted a design-led approach to redevelopment of the site to ensure that the layout, scale and massing of the proposals responds to the site's townscape context. The scheme has been designed to optimise the development potential of the site and build on the positive characteristics of the surrounding area and ensure no adverse impact on neighbouring amenity. The proposed architectural style and materials are explained in the Design and Access Statement.

### **Parking**

- 5.10 The scheme provides 36 off-street parking spaces including 6 electric vehicle charging spaces and 4 disabled parking spaces. In addition, the scheme incorporates 2 drop-off spaces for parents and the provision for 6 additional electric vehicle charging spaces. The scheme also incorporates discreetly designed cycle storage structures with provision for 56 safe/secure cycle spaces in total which complies with the relevant parking standards.

### **Residential Amenity Space Provision**

- 5.11 The scheme seeks to maximise the provision of private amenity space, having regard to the site's location and the nature of the development. All new dwellings have access to private external amenity space in the form of patio terraces or balconies which comply with the relevant standards, and additionally with direct access onto communal amenity space at the rear of the residential blocks. The communal amenity space will be provided for use by all residents of the development.

### **Scamps**

- 5.12 The proposal includes for a new nursery building, designed specifically in consultation with Scamps to meet their current and future needs. The proposals include the provision of a nursery hall and associated rooms, together with a substantial all-weather canopy in a courtyard space. This provides a protected and relatively private area for children to take advantage of indoor/ outdoor activities. The larger hall space provides for after-school activities for older children, together with the opportunity for additional dual community use.
- 5.13 The site layout includes drop off / pick up areas as well as secure cycle parking and covered area for buggy storage.

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### **Landscaping**

- 5.14 The proposed Landscape Masterplan shows that the scheme incorporates landscaping on the site and public realm improvements on the Strathmore Road frontage which are integral with the design and layout of the development. The landscaping proposals complement the contemporary design of the building and provide an attractive environment.
- 5.15 The Masterplan incorporates the following landscape design features:
- Creation of 2 metre wide native planting strip along the western and southern boundaries. Stanley Road and Shacklegate Lane properties;
  - Proposed robust landscape to residential frontages to define public and private space including low evergreen hedges and ornamental planting beds;
  - Proposed green roofs to provide additional biodiversity;
  - Decorative tree planting throughout the site;
  - New planting to eastern site boundary abutting rear gardens to Shacklegate Lane properties.
- 5.16 The scheme also includes a publicly accessible pocket park at the junction of Strathmore Road and the site access road. The pocket park will be open in nature with no fencing or enclosure and a tree seat around the trunk of a retained tree to encourage use by residents and the wider community.

### **Ecology**

- 5.17 The scheme includes a range of ecology enhancement features in accordance with the Ecology Appraisal including:
- External and internal light mitigation;
  - Green roofs to provide additional sources of food for insects;
  - Integrated bat boxes;
  - Nesting bird boxes;
  - Green walls;
  - Wild flower lawns;
  - Suitable trees to benefit pollinators and foraging birds;
  - All year round food sources incorporated within the landscape plan.

### **Waste Management**

- 5.18 Details of the proposed refuse/recycling provision and servicing facilities are set out in the Waste Management Strategy and illustrated in the Design and Access Statement prepared by Living Architects (Section 6.5).

### **Energy and Sustainability**

- 5.19 The proposed energy strategy for the development is set out in the Energy and Sustainability Statement which confirms:

- Passive and active design measures including a well-insulated thermal envelope;
- A high-efficiency ASHP system to supply space heating and hot water within the nursery building;
- Individual high-efficiency gas-fired boilers to supply space heating and hot water within the residential dwellings;
- A 25kWp PV array to provide on-site electrical generation and CO<sup>2</sup> offset for the residential dwellings;

5.20 The Energy Strategy has been developed following the GLA Energy Hierarchy and includes passive and active design measures and Green LZC technologies to achieve a 35% improvement over Baseline CO<sup>2</sup> emissions.

5.21 The Energy and Sustainability Assessment confirms that the development scores 52 points against LB Richmond upon Thames Sustainability Checklist and demonstrates that the scheme will achieve an 'Excellent level', 6 credits within BREEAM ENE01. As detailed in the Energy and Sustainability Statement the 18.6% reduction of CO<sup>2</sup> emissions using LZC technologies enables 1 credit to be achieved in BREEAM ENE04.

5.22 Any shortfall in emissions for the residential element (to meet zero carbon standards) of the scheme may require to be off-set through contribution to a Carbon Offset Fund set up by the London Borough of Richmond upon Thames or provision of additional PV panels on the nursery building to improve further the on-site electrical generation (subject to negotiations).

#### **Sustainability Urban Drainage**

5.23 The proposed development will include a sustainable urban drainage system (SuDS). The system is proposed to restrict the surface water discharge rate and provide betterment in terms of quality in accordance with the London Plan policy standards. The proposed SuDS components will allow the development to meet surface water management requirements for water quantity, whilst also providing a range of additional benefits for water quality, biodiversity and ecological value, amenity value, and health and wellbeing of residents.

5.24 A number of SuDS components are proposed as part of a surface water drainage strategy has been for the site, specifically:

- Soakaway with capacity of approximately 210m<sup>3</sup>.
- Green roof (extensive sedum green roof-type system) with approximately 743m<sup>2</sup> total surface area.
- Surface water to be discharged at controlled rate (to achieve 50% betterment against the pre-development run-off rates) from the site to the local public surface water sewer.

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## 6. PLANNING POLICY CONTEXT

6.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 and section 70 (2) of the Town and Country Planning Act 1990 requires that planning applications be determined in accordance with an up-to-date Development Plan unless material considerations indicate otherwise.

6.2 The Court of Appeal judgment in the case of ***R (West Berkshire District Council and Reading Borough Council) v. Secretary of State for Communities and Local Government [2016] EWCA Civ 441*** is an important judgment which defines the role of Central Government in promulgating national planning policy, the nature of such policy and its interaction with the development plan in the planning system. In essence, the judgement endorses the Government's decision to adopt new national policy by way of Written Ministerial Statement (WMS) and the relevant parts of the National Planning Practice Guidance (NPPG). Hence, WMS and the NPPG are also material considerations, which must be taken into account in planning decisions.

### National Planning Policy Framework

6.3 The National Planning Policy Framework (NPPF) published February 2019, sets out the Government's current national planning policy for England. NPPF paragraph 212 confirms that the policies in the Framework are material considerations which should be taken into account in dealing with applications from the day of its publication i.e. from 24<sup>th</sup> July 2018. In doing so, it does not change the statutory status of the development plan as the starting point for decision-making but it does constitute a material consideration in the determination of planning applications.

6.4 The key policy statement is set out at paragraph 10 of the NPPF, which states that at the heart of the Framework is a presumption in favour of sustainable development. For decision-taking this means:

*"c) approving development proposals that accord with an up-to-date development plan without delay; or*

*d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*

*i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*

*ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."*

### Housing Provision

6.5 Paragraph 59 requires local planning authorities to provide a sufficient amount and variety of land to come forward where it is needed and ensure that land with permission is developed without unnecessary delay, in order to support the Government's objective of significantly boosting the supply of homes.



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- 6.6 The revised NPPF (February 2019) incorporates significant changes to national planning policy as it applies to the application site, most notably in several key areas considered below.

*Affordable Housing*

- 6.7 Where there is a need for affordable housing with the community, the NPPF (paragraph 62) requires planning policies to specify the type of affordable housing required, and expect it to be met on-site and major development involving the provision of housing should provide at least 10% of the homes to be available for affordable home ownership (paragraph 64). To support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, paragraph 63 states that any affordable housing contribution due should be reduced by a proportionate amount.

*Small and Medium Sized Sites*

- 6.8 NPPF (2018) paragraph 68 highlights the important contribution small and medium sites – such as the application site – can make to meeting local housing need. The revised Framework recognises that small sites are often built-out relatively quickly, thereby making a significant contribution towards meeting housing delivery targets in the short-term. National planning policy now requires local planning authorities to support the development of ‘windfall sites’ such as the application site, through their policies and decisions – giving ‘**great weight**’ to the benefits of using suitable sites within existing settlements for homes (see NPPF 2018, paragraph 68). Hence, the revised NPPF requires great weight to be given to the benefits of redeveloping St Catherine’s for housing.

*Achieving Appropriate Densities*

- 6.9 The revised NPPF includes a section promoting the effective use of land to meet the need for homes by achieving appropriate densities. Paragraph 122 encourages LPAs to support development that makes efficient use of land taking into account the desirability of maintaining an area’s prevailing character and setting or of promoting regeneration and change.
- 6.10 The NPPF encourages the use of minimum density standards to seek a significant uplift in the average density of residential density within cities, town centres and other locations that are well served by public transport. Density ranges should also be set in other areas that reflect the accessibility and potential of different areas – rather than one broad density range (see paragraph 123).

*Achieving Well-Designed Places*

- 6.11 The NPPF confirms that good design is a key aspect of sustainable development and that permission should be refused for development which does not take account of any local design standards or styles guides. To provide maximum clarity about design expectations, paragraph 126 recommends that Local Plans or supplementary planning documents should use design guides to provide a framework for creating distinctive places, with a consistent and high quality standard of design. The level of detail and degree of prescription should be tailored to the circumstances in each place, and should allow a suitable degree of variety where this would be justified.

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- 6.12 The NPPF requires design policies that seek to protect local character to be grounded in an understanding and evaluation of each area's defining characteristics to provide maximum clarity about design expectations. The Framework encourages the publication of character studies that identify the special qualities of each area and explain how these qualities should be reflected in development.
- 6.13 In accordance with the NPPF, Elmbridge Council published the Design and Character SPD Companion Guide (April 2012) which forms an integral part of the Elmbridge Design and Character SPD. These documents fulfil national policy requirement for design policies to be grounded in an evaluation of each area's local character.

#### *Highway Safety*

- 6.14 NPPF paragraph 109 states *"development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."* The Transport Assessment confirms that the application scheme would not have an unacceptable impact on highway safety or the road network.

#### **RICHMOND HOUSING SUPPLY AND DELIVERY**

- 6.15 NPPF paragraph 73 requires local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.

- 6.16 Richmond Annual Monitoring Report 2018-2019 headline findings in terms of the effectiveness against housing delivery targets are:

*Housing supply – the rate of completions (419 units net) significantly exceeded the annual target in the London Plan 2015 of 315 homes per annum, with completions on 6 large sites. For future housing land supply there is an identified 1,508 units over the 5-year period, which is 309 units more than the remaining target in the London Plan 2015.*

*Affordable housing – 17% of units (70 units net) were delivered as affordable, from two large sites, which is considerably below the strategic borough-wide target.*

- 6.17 The Strathmore Centre is included as a future housing site in the AMR (Years 6-10 Housing Land Supply). The report states that in accordance with the NPPF a supply of specific, developable sites or broad locations for growth should be identified for years 6-10. To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged. Hence, the site is considered to be a suitable site for new housing developable within the next 10 years.

- 6.18 In terms of planning constraints and the Council's current position, the AMR states:

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*“Partially vacant site. The Council is expecting disposal for residential and draft Site Allocations Plan Pre-Publication site TD2 proposed residential, subject to relocation and alternative provision for existing social infrastructure use. Identified in the Local Plan Review Scoping Consultation which suggests need for social infrastructure facilities, and may be capacity/opportunity for a mix of uses including residential.”*

6.19 The AMR identifies an approximate number of residential dwellings for the site of 20-30 units.

#### **THE DEVELOPMENT PLAN**

6.20 For the purpose of assessing the application against relevant policies, the ‘Development Plan’ relevant to consideration of redevelopment of the site comprises the London Plan (Consolidation with Alterations since 2011) and the London Borough of Richmond upon Thames Local Plan adopted on 3<sup>rd</sup> July 2018 are both relevant to this site. The new Local Plan replaces previous policies in the Core Strategy and Development Management Plan.

6.21 The Local Plan and associated Proposals Map confirm that the site falls within the following site specific or area designations:

- Site Allocation SA 7 Strathmore Centre, Strathmore Road (Local Plan adopted July 2018)
- Area poorly provided with Public Open Space (LDF Proposals Map 2015)

6.22 The following generic policies are also relevant to consideration of the proposed redevelopment for affordable housing and community use.

6.23 **Policy LP 1 – Local Character and Design Quality** requires new development to respect the local environment and character having regard to height, scale, massing, density, space between buildings, sustainable design and construction etc.

6.24 **Policy LP 2 – Building Heights** requires new buildings to generally reflect the prevailing building height within the vicinity. Where new buildings are taller than the surrounding townscape they must be of high architectural design quality and standards, deliver public realm benefits and have a positive impact on the character and quality of the area.

6.25 The Teddington and Hampton Wick Village Plan guidance states that scale height and massing should relate to surrounding residential development, and that a contemporary design would be appropriate in relation to the Stanley Primary School. The elevations and site sections that the proposed height, scale, massing as well as the proposed layout, orientation and separation distances all respect the prevailing character of the area.

6.26 **Policy LP 8 – Amenity and Living Conditions** requires all new development to protect the amenity and living conditions of occupiers of existing adjacent properties and new residential dwellings in terms of sunlight and daylight, privacy, noise and sense of enclosure, visual intrusion

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and overbearing impact as well as reasonable enjoyment of existing or proposed external amenity space.

- 6.27 The application is supported a Daylight/Sunlight/Overshadowing Assessment which undertook detailed analysis and demonstrates that the proposed development would not have any noticeable impact on neighbouring residential dwellings. The application drawings and DAS show that the separation distances between the proposed residential blocks and neighbouring dwellings are such that there would be no adverse impact in terms of privacy, outlook, visual intrusion or sense of enclosure.
- 6.28 **Policy LP15 Biodiversity** encourages the creation and incorporation of new biodiversity features and habitats into new development and where development will impact on existing habitat, to mitigate or compensate for any harm or loss. The ecology report confirms that the development will not impact on existing habitat and the scheme incorporates a range of biodiversity enhancement features.
- 6.29 **Policy LP 16 – Trees Woodland and Landscape** seeks to resist the loss of trees unless dead dying or dangerous, or a tree is causing significant damage to neighbouring structures; or has little or no amenity value; or for reasons of good arboricultural practice.
- 6.30 The proposed development retains all significant trees on the site as identified in the arboricultural survey with the exception of T23-T27 (group of silver birch trees with one-sided/suppressed form). The Landscape Masterplan confirms that the existing tree stock on the site will augmented with additional planting of appropriate species.
- 6.31 **Policy LP 17 Green Roofs and Walls** encourages – where feasible – the incorporation of green and/or brown roofs into all new major development. The Energy and Sustainability Assessment confirms that the scheme will incorporate green roofs located on block B and the nursery roof in accordance with Policy LP17.
- 6.32 **Policy LP 20 – Climate Change Adaptation** requires new development to be designed to minimise the effects of overheating and minimise energy consumption. The Energy Strategy set out in the Energy and Sustainability Statement confirms that the proposed development complies fully with Policy LP 20.
- 6.33 **Policy LP 21 – Flood Risk and Sustainable Drainage** requires the use of Sustainable Urban Drainages Systems (SUDS) in all new development achieving greenfield run-off rates wherever feasible, or where greenfield run-off rates are not feasible, at least a 50% attenuation of the site's surface water run-off at peak times based on the levels existing prior to the development. The SuDS Strategy confirms that preliminary hydraulic modelling of the proposed development site has been undertaken based on a notional surface water drainage network, and demonstrates that the proposed SuDS components would be viable for the surface water drainage strategy for the site, in

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order to achieve the targeted discharge rates, whilst mitigating flood risk to the site and surrounding area.

- 6.34 **Policy LP22 – Sustainable Design and Construction** requires new major residential development (10 units or more) to achieve zero carbon standards, to achieve maximum water consumption of 110 litres per person per day and connect to existing DE networks where feasible. The Energy and Sustainability Statement confirms that the proposed development complies fully with Policy LP22.
- 6.34 **Policy LP24 – Waste Management** requires all new development to provide adequate refuse and recycling storage space and facilities in accordance with the Council's SPD. The proposed floor plans and DAS confirm that the scheme complies with Council's requirements for refuse and recycling storage.
- 6.35 **Policy LP 28 – Social and Community Infrastructure** states that the loss of social or community facilities will be resisted unless:
1. There is no longer an identified need or the facilities no longer meet the needs of users and cannot be adapted; or
  2. Existing facilities are being adequate or re-provided or there are sufficient suitable alternative facilities in the locality; and
  3. The potential of re-using or redeveloping the existing site for the same or an alternative social infrastructure use for which there is a local need has been fully assessed – this should include marketing for a period of at least two consecutive years.
- 6.36 The application is supported by evidence from the Council's Estate's Department confirming that the site has remained on the disposal list – which is a publicly available document - since 2010 with periodic updates reported to the Council's Cabinet. In that time, no group has come forward and identified a need for a community facility and the Council's position remains that it does not have an alternative community use for the building. The disposal of the site forms part of the Council's overall estates strategy which includes the provision of social infrastructure being met elsewhere in the borough.
- 6.37 Policy LP 28 also states where the above evidence has been provided and the change of use away from social and community infrastructure use has been justified, the Local Plan requires redevelopment for other employment generating uses or affordable housing to be considered. The supporting text to Policy LP28 recognise that, if a public disposal process has taken place as part of an agreed programme of social infrastructure re-provision which confirms that the disposal of assets is necessary to ensure continued delivery of social infrastructure and related services, this will be taken into account. Furthermore, the policy justification also states that where the above evidence has been provided 100 per cent affordable housing schemes would also be supported by the Council where other policy priorities are met to demonstrate wider benefits to meet community needs. In this case, the proposed development includes 100 per cent affordable in accordance

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with this policy requirement. The proposed development complies fully with the requirements of Policy LP28.

- 6.38 In addition to policy LP 28 requirements, Site Allocation SA7 states that *“only if other alternative social or community infrastructure uses have been explored and options discounted in line with other policies in this Plan, would an affordable housing scheme with on-site car parking be considered as a potential redevelopment option.”*
- 6.39 **Policy LP 35 – Housing Mix and Standards** requires development to generally provide family sized accommodation except in town centres and Areas of Mixed Use. All new housing developments must comply with the National Technical Housing Standards and should provide adequate external space having regard to the Council’s SPD, as appropriate. Policy LP35 also requires 90% of all new dwellings to meet BRR M4 (2) and 10% are required to meet BRR (M4 (3).
- 6.40 The borough’s most up-to-date housing needs assessment confirms a greater need for smaller affordable housing units. The scheme provides an appropriate mix of unit sizes having regard to the proposed tenure and complies with the Local Plan requirement for accessible housing.
- 6.41 **Policy LP 36 – Affordable Housing** expects 50% affordable housing units with a tenure mix of 40% affordable housing for rent and 10% intermediate housing. The affordable housing mix is also required to reflect the need for large rented family units. The scheme provides 100% affordable housing of which 90% will be London Affordable Rent and the remaining 10% intermediate housing.
- 6.42 **Policy LP 44 – Sustainable Travel Choices** promotes safe, sustainable and accessible transport solutions which seek to ensure that new development does not have a severe impact on the operation, safety or accessibility to the local or strategic highway network.
- 6.42 **Policy LP 45 – Parking Standards and Servicing** requires new development to provide parking in accordance with the standards set out in Appendix 3. The Transport Assessment confirms that the proposed development complies fully with the Local Plan policy requirements for sustainable development in terms of sustainable travel choices, parking and servicing.

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## 7. KEY PLANNING CONSIDERATIONS

7.1 The site comprises previously-development brownfield land in a sustainable location as defined by the National Planning Policy Framework.

### **Loss of Existing Use**

7.2 The proposed redevelopment of The Strathmore Centre follows the decision by the Council's Cabinet Members on 15<sup>th</sup> March 2018 that the Strathmore Centre is formally declared as being surplus to the Council's operational requirements and that PA Housing be asked to design a scheme for redevelopment of the site affordable housing incorporating a new nursery building to be leased by Scamps at a market rent.

7.3 The new Local Plan 2018 designates the site as Site Allocation SA 7 which states that, due to its location in a primarily residential area and its proximity to Stanley School and St James's School, it is ideal for the provision of nurseries and other child-care services. Only if other alternative social or community infrastructure uses have been explored and options discounted in line with other policies in the Local Plan, would an affordable housing scheme with on-site car parking be considered as a potential redevelopment option.

7.4 The officer's pre-application response confirms exceptional circumstances may warrant loss of the existing D1 use without undertaking a formal marketing exercise on the basis that:

1. The scheme is not wholly for a residential scheme, and does provide some social infrastructure use on the site.
2. The site has been declared surplus, and has remained on the Council's disposal list, which is a publicly accessible document, and no group has come forward and identified a need for a community facility. Officers do however recommend:
  - Any submission is provided with the links for a period of no less than 2 years demonstrating this is on the public disposal list
  - The public disposal process has taken place as part of an agreed programme of social infrastructure re-provision which confirms that the disposal of assets is necessary to ensure continued delivery of social infrastructure and related services
  - Confirm if there have been any discussions with partners regarding the re-use of the site for social infrastructure uses.
3. The scheme proposes a 100% affordable housing scheme, which is supported and welcomed, and as outlined in the following documents there is unequivocal need for such in the Borough.

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- 7.5 The proposed redevelopment of the Strathmore Centre for affordable housing is supported by evidence from Richmond Council's Estates Department demonstrating that 'other alternative social or community infrastructure uses' have been explored and options discounted'.
- 7.6 The scheme provides purpose-built accommodation to meet the current and future needs of Scamps for day nursery and after-school accommodation. The new nursery building has been designed in collaboration with Scamps and meets their specific requirements. As stated in the Energy and Sustainability Statement, the energy strategy confirms that the energy efficient nursery building will incorporate low green energy technology to provide heating and cooling which will reduce the operational energy costs for Scamps. As such, the proposed mixed use redevelopment of the site for affordable housing and new day nursery provides substantial planning benefits and accords with the Local Plan site allocation.

#### **Principle of Residential Development**

- 7.7 Regulation 4 of the Town and Country Planning (Brownfield Land Register) Regulations 2017 requires local Planning Authorities to publish brownfield land registers identifying land suitable for residential and mixed-use developments. The application site is included on the brownfield land register confirming the site's suitability for residential or mixed use development including residential use.
- 7.8 Local Plan policy LP28 (D) confirms where the Council is satisfied that the change of use away from social and community infrastructure use has been justified, redevelopment for other employment generating uses or affordable housing should be considered. Richmond's Annual Monitoring report 2018-2019 confirms that the borough is exceeding its 5 years housing supply and 3 years housing delivery but is failing to meet its affordable housing need. The provision of 100 per cent affordable housing as part of a mixed use redevelopment accords fully with Policy LP 28 and the Local Plan site allocation.

#### *Density of Development*

- 7.9 The site area is 0.6 ha – the residential site area being 0.52 ha. The site is located in an area of moderate public transport accessibility (PTAL 2). The surrounding area is predominantly suburban in character – typically residential buildings of two-three storeys.
- 7.10 The AMR identifies an approximate number of residential dwellings for the site of 20-30 units. The London Plan density matrix (Table 3.2) indicates an appropriate density range in this location of 50 – 95 dwellings per hectare (150-250 hr/ha) on the basis of an average of 2.7-3.0 habitable rooms per unit or 35—65 dwelling per hectare on the basis of an average 3.1-3.7 habitable rooms per unit. The application scheme comprises an average 3 habitable rooms per unit.
- 7.11 The residential development density of the scheme is 58 dwellings per hectare (175 habitable rooms per hectare) compared to the London Plan Density Matrix recommended density range of 50



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– 95 dwellings per hectare (150-250 hr/ha). As such, the scheme falls at the lower end of the density range recommended in the development Plan.

- 7.12 The London Plan emphasizes that the density matrix should not be applied mechanistically and housing density is only the start of planning housing development, not the end. However, the density matrix calculations highlight that achieving an output consistent with the density matrix (Table 3.2) would be dependent largely upon the relevant housing type. A largely flatted development with lower average hr/unit rate would be more likely to comply with the density range but conversely would not be consistent with the predominant housing typology for this suburban area.
- 7.13 Given the current priority in housing need in Richmond borough is for smaller units (1 and 2 bedroom units) the proposed density of development is considered to be entirely appropriate for this site.

#### *Siting and Layout*

- 7.14 The site is a long wedge-shaped parcel of land that is a maximum of 138 metres long. It has a 58 metre wide road street frontage tapering to 35 metres wide at the rear boundary of the site. Residential gardens back onto the site on three sides which constrain siting and layout of new development, particularly to the east (21-31 Strathmore Road) and south (1-8 Birdwood Close) where the gardens are notably shorter than neighbouring properties and to the south.
- 7.15 The proposed layout responds the established townscape context. Block A fronts onto Shacklegate Lane and re-establishes the building line and street frontage. Block B is L-shaped, addressing the access road and providing a new building frontage within the site. Both residential blocks back onto communal amenity space and the proposed layout provides appropriate separation distances to neighbouring residential properties.

#### *Bulk/Scale/Massing*

- 7.16 The prevailing character of the surrounding area is defined by 2-3 storey buildings comprising semi-detached or terraced properties as well as some larger scaled building including the Strathmore Centre, Stanley School and some flatted infill development. The proposed three-storey residential development would not exceed the prevailing height of the area and the single-storey nursery building would replace an existing single-storey structure. The scheme accords fully with the Local Plan design policies, notably LP1, LP2 and LP39.

#### *Detailed Design*

- 7.17 The Local Plan requires all new development to be of the highest design quality. It is noted that the recent development of Stanley Junior School incorporates buildings in a contemporary style. Given the nature of the site and its relationship to Stanley School a contemporary approach is considered to be appropriate in this location. The proposed contemporary design approach is endorsed by Richmond Design Review Panel.

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#### *Tenure and Mix*

- 7.18 The development plan requires the scheme to address local housing need. Given the site's status as a 'disposal site' subject to agreement on an appropriate tenure, this aspect of the development has been addressed fully in negotiations with Richmond Housing Department. The proposed tenure is a mix of London Affordable Rent and Shared Ownership which meets the Council's urgent housing need. The proposed mix addresses the priority for 1 and 2 bedroom units identified in the borough's housing need assessment.

#### *Residential Amenity*

- 7.19 Redevelopment of the site is constrained by the proximity of neighbouring residential properties. It is considered that the proposed approach – as set out in the proposals prepared by Living-Architects – would realise the optimum development potential of the site, without any adverse impact on neighbouring residential amenity. The scheme should provide sufficient external amenity space to meet the minimum standards set out in the Council's SPD.

#### *Parking Provision*

- 7.20 The site does not fall within a controlled parking zone (CPZ) and on-street parking is restricted on Strathmore Road by parking restrictions along the school frontage. It was also noted that the site's access road is currently used on an informal basis by parents dropping off and picking up children from Stanley Junior and Infant Schools.
- 7.21 The schemes provide 36 car parking spaces for 30 units and the day nursery and accords with the Local Plan Parking Standards. Although the Parking Standards are expressed as maxima in the London Plan, the Local Plan states *"the standards set are maximum parking levels and car parking provision should not be at a level less than these standards, unless an exceptional circumstance is demonstrated."*
- 7.22 The Local Plan also states that developers may only provide fewer parking spaces, including car free schemes, if they can demonstrate as part of a Transport Statement or Transport Assessment with supporting survey information and technical assessment that there would be no unacceptable adverse impact on on-street parking availability, amenity, street scene, road safety or emergency access in the surrounding area, as a result of the generation of unacceptable overspill of on-street parking in the vicinity.
- 7.23 The parking surveys confirm there are varying levels of on-street parking both on the site and in surrounding streets, with substantial spare capacity in the evenings and overnight when the demand for residents parking is at its highest. Some of the daytime parking currently taking place on the site is related to the operation of Scamps but a substantial proportion relates to unauthorised commuter parking and drop-off / collections at Stanley School.

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7.24 The proposed development will provide on-site car parking in accordance with the Councils adopted parking standards and will accommodate its own parking demand augmented, if deemed to be necessary, by a Travel Plan in respect of the nursery use. On this basis, the proposals are compliant with Policy LP45 of the Local Plan.

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## 8. SUMMARY AND CONCLUSIONS

- 8.1 In summary, the site comprises previously developed brownfield land in an established settlement and within easy walking distance of public transport and local facilities. As such, the proposed development comprises 'sustainable development' as defined by the NPPF.
- 8.2 Richmond borough is exceeding its 5 years housing supply and 3 years housing delivery but is failing to meet its affordable housing need. The provision of 100 per cent affordable housing and re-provision of community facilities as part of a mixed use redevelopment accords with the Local Plan expectations for the site.
- 8.3 This scheme offers a clear opportunity to make more efficient use of previously developed land in a sustainable location to help meet the borough's identified housing need. The site is ideally located to provide higher density housing comprising a mixture of one-, two- and three-bedroom residential dwellings - being within easy walking distance of community facilities, local services and public transport.
- 8.4 Having regard to the prevailing character and the policy requirement for residential schemes to optimise the development potential of sites in sustainable locations such as this, the site can accommodate the proposed 3-storey apartment blocks which are considered to be appropriate to the context.
- 8.5 The development provides an inclusive, architect-designed scheme that is attractive to look at and will enhance the character and visual quality of the locality. It responds innovatively to the site constraints whilst seeking to optimise an appropriate and sustainable form of development.
- 8.6 The application is supported by a number of specialist consultants' reports addressing relevant planning matters including Design & Access, Transport, Sunlight and Daylight, Arboricultural Assessment, Sustainability Urban Drainage, Ecology and Energy/Sustainability.
- 8.7 The scheme has been subjected to a comprehensive pre-application consultation with the local planning authority, housing department and highway authority as well as local community engagement with local residents and other stakeholders.
- 8.8 This Statement demonstrates that the application has been prepared in the context of and informed by pre-application discussions with Richmond upon Thames Council and the local community. The scheme delivers high quality housing and a day nursery within a sustainable location to meet an identified local need. The proposed development does not cause an unacceptable impact on the amenity of existing neighbouring properties and would not result in any harm to the character of the local area. As such, the scheme accords with all relevant planning policy.

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8.9 In accordance with the Town and Country Planning Act (as amended), the scheme demonstrably complies with relevant Development Plan policies and in accordance with the presumption in favour of sustainable development endorsed by the Development Plan, the application for planning permission should be considered promptly and favourably.

# APPENDIX ONE

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## **LONDON BOROUGH OF RICHMOND UPON THAMES**

### **CABINET**

**DATE:** THURSDAY 15<sup>th</sup> MARCH 2018

**REPORT OF:** JOINT DEPUTY LEADER - ENVIRONMENT, BUSINESS AND COMMUNITY

**TITLE:** ASSET MANAGEMENT UPDATE REPORT

**WARDS:** (All Wards);

**KEY DECISION?: YES/**

**IF YES, IN FORWARD PLAN?: No**

#### **For general release**

### **1. MATTER FOR CONSIDERATION**

- 1.1 This paper sets out a proposed high-level approach to the management of the Council's property assets, recommends a way forward on a number of major sites and seeks agreement to a new procedure for the sale of surplus assets.

### **2. RECOMMENDATIONS**

Cabinet recommended to

- (i) Agree the proposed high-level strategic approach to managing the Council's assets outlined in paragraphs 3.1 - 3.2.
- (ii) Agree the proposed disposals procedure attached at Appendix A
- (iii) Agree the recommendations for individual projects outlined in paragraphs 3.8 - 3.30.

### **3. DETAILS**

#### **Strategic objectives for property assets**

- 3.1 To codify the Council's strategic approach to assets, a Corporate Asset Strategy will be developed over the next 12 months and at this initial stage it is considered useful to consider some high-level objectives for assets, which also align with those parts of the Council's 2016-2019 Corporate Plan that relate to property. These are
- (a) to ensure value for money in the management, maintenance and use of land and buildings, including income generation;

- (b) To support and enhance service delivery, ensuring user satisfaction and meeting broader Council objectives;
- (c) To ensure the Council meets all its statutory obligations and that buildings are fit for purpose, in terms of location and condition; and
- (d) To ensure that the procurement of works for buildings ensures sustainable design and that buildings are maintained and managed in a way that maximises their energy efficiency.

3.2 More specifically, the use of assets should be targeted to meet clear service and policy objectives, for example

- (i) Raising revenue and capital receipts to support service delivery
- (ii) Improvements to our town centres
- (iii) Meeting the demand for school places and supporting parental choice
- (iv) Delivery of affordable housing
- (v) Supporting voluntary sector partners

#### **Approach to the disposal of surplus assets**

3.3 When considering property assets that are potentially surplus to requirements there are two key issues that need to be considered. Firstly, before they are declared surplus, a thorough assessment is undertaken to ensure there is no immediate or medium-term service requirement. Secondly, if they are declared surplus that the process of disposing them is clear and meets the Council's financial and wider objectives.

3.4 A proposed Disposal Procedure is attached at Appendix A. The Procedure will ensure that the Council's approach to disposals is clearly defined, complies with statutory requirements and is competitive and transparent.

#### **Overview of disposals programme**

3.5 The current estimate of capital receipts (in part contingent on the decisions contained elsewhere in this report) is attached in the confidential Appendix B

3.6 The Director of Resources has commented that as well as the generation of receipts being important for funding the existing extensive capital programme receipts generated in year can be used to fund non-capital costs associated with efficiency programmes including the SSA. Current proposals assume that the Council will fund the majority of remaining restructuring, IT and building works from such funds.



- 3.7 Updates on a number of key properties together with recommendations on the proposed ways forward are considered below

**Meadows Hall, Church Road, Richmond (South Richmond)**

- 3.8 Meadows Hall is a former day centre (shown in a plan at Appendix C) which is currently vacant apart from occasional use when the car park is used to house a temporary building as a polling station. The property has been identified as part of the Council's sale programme and remains surplus to the Council requirements.
- 3.9 Initial discussions have been undertaken with Paragon Asra Housing Association ("Paragon") about them acquiring and developing the site. In line with the proposed Disposals Procedure is now recommended that the site be openly marketed for affordable housing with Paragon being invited to bid.
- 3.10 It is recommended that in line with the proposed Disposals Procedure that
- (a) The site is formally declared as being surplus to the Council's operational requirements
  - (b) A planning brief is prepared that will cover the proposed use and design of any future development.
  - (c) The site is openly marketed using the two-stage process outlined in paragraph 2.4 of the Disposals Procedure and Paragon be invited to bid.
  - (d) That the Joint Deputy Leader – Environment, Business and Community, in consultation with the Assistant Director, Property Services, is given delegated approval to agree terms and conclude the sale of the land provided that the terms proposed represent market value (reflecting the restriction on the sites use to affordable housing).

**Friars Lane Car Park (South Richmond)**

- 3.11 The sale of this site (shown on the plan at Appendix D) has been previously approved by Cabinet. The site has considerable constraints – it is bounded by a number of Listed Buildings, is located in a flood risk zone and is protected by a flood defence wall on one boundary. These factors all limit the scale and nature of any development and hence the potential capital receipt. The car park currently produces a substantial income and before any final decision is made on whether to sell the site the financial benefits of selling the site against retaining it for its income will be fully explored.
- 3.12 It is recommended that the financial implications of sale are identified and a further report is brought to Cabinet to firmly recommend either sale or retention.

**Former Teddington Youth Centre & Strathmore Centre, Strathmore Road, Teddington (Fulwell and Hampton Hill)**

- 3.13 The Council has been working with Paragon to develop a scheme that would provide affordable housing and a replacement nursery (currently provided by SCAMPS). The reprovision of the nursery building is a planning requirement. The sites are shown at Appendices Ei & Eii.
- 3.14 Before the scheme can proceed it was necessary to agree a design solution for the nursery building which would be retained by the Council with the intention of it being leased to SCAMPS. An acceptable design has now been agreed for the nursery which places it prominently on Stanley Road and allows the development of the remaining site to progress in parallel.
- 3.15 Due to the level of detailed design undertaken by Paragon and the need to maintain momentum for this site's sale and development it is recommended that Paragon be retained to acquire this site (assuming acceptable terms can be agreed) and that therefore the site is not openly marketed. This is an exception to the proposed Disposals Procedure but is considered reasonable in all the circumstances. It is recommended that
- (a) The site is formally declared as being surplus to the Council's operational requirements
  - (b) Officers finalise the design of the nursery and then agree terms with SCAMPS for their new lease at a market rent.
  - (c) Paragon be asked to progress its design and submit a final offer to the Council that is then independently assessed by the Council's valuers.
  - (d) That the Joint Deputy Leader – Environment, Business and Community, in consultation with the Assistant Director, Property Services, is given delegated approval to agree terms and conclude the sale of the land provided that the terms proposed represent market value (reflecting the restriction on the sites use to affordable housing).

**Garden Cottage, Orleans House (Twickenham Riverside)**

- 3.16 At a Cabinet meeting on 19 November 2015, members considered a report in regard to the disposal of Orleans House Garden Cottage (shown on the plan at Appendix F) and resolved –
- (a) *That further to the security of planning permission, the property is offered for sale by auction, and that approval be given to the sale of the Council's interest in the property to the highest bidder at auction in excess of the agreed reserve figure.*

- (b) Delegate authority to the Assistant Director of Environment to agree the reserve figure in consultation with the Deputy Leader and Cabinet Member for Finance to agree the reserve figure*
- (c) That the capital receipt from the sale of the property be ring-fenced for Orleans House Gallery.*

3.17 The property is vacant, in poor repair and is surplus to the Council's operational requirements. Given the sensitive location of the subject property, the Assistant Director, Property Services is of the view that rather than obtaining full planning permission and selling the property at auction, it would be preferable to progress the sale based on a private treaty sale. The sale will be supported by a Planning Brief and will entail a two-stage process that is designed to ensure a focus on design and maximise value. It is recommended that

- (a) The site is formally declared as being surplus to the Council's operational requirements
- (b) A planning brief is prepared that will cover the proposed use and design of any future development
- (c) The site is openly marketed using the two-stage process outlined at 2.4 of the Disposals Procedure.
- (d) That the Lead Member for Planning and Strategic Development, in consultation with the Assistant Director, Property Services, is given delegated approval to agree terms and conclude the sale of the land provided that the terms proposed represent market value

#### **North Lane Depot and Car Park; Elleray Hall And 4 Waldegrave Road, Teddington (Teddington)**

3.18 The depot and car park are surplus to operational requirements. Elleray Hall is currently occupied as a day centre for the elderly and 4 Waldegrave Road accommodates RAIDS and RUILS – two local voluntary organisations. Plans of the properties are attached as Appendices G, H, I & J.

3.19 These sites are being considered as part of a feasibility study/options appraisal exercise with a view to delivering a new fit for purpose community building in Teddington. Included within the feasibility study are Elleray Hall, 4 Waldegrave Road and the former North Lane depot and car park. These proposals have been subject to extensive discussions with the groups and recent wider engagement with the users and the public. There are two principal options which are to locate the new hub building either at 4 Waldegrave Road or on the site of Elleray Hall.

3.20 Prior to these proposals there had been ongoing discussions with the Park Lane Doctors Surgery to explore the possibility of delivering a new doctors'

surgery on the North Lane sites. In early August 2017, the Council made the Practice a comprehensive offer which Officers believe would be capable of delivering the new surgery. The proposal showed a clear route to the delivery of a new surgery on the North Lane sites, subject to Cabinet approval, and a clear and unequivocal commitment from the Council to support the surgery's aspirations.

- 3.21 The Practice rejected this proposal in early September 2017 and advised that it intended to pursue its interest in the proposed Udney Park development. Notwithstanding this rejection the Council kept its offer open for a further two months until 31<sup>st</sup> October 2017 – no further response was received.
- 3.22 In absence of a GP use the proposal is that the North Lane site be sold in the open market for D1 use, possibly as a nursery. This option would not preclude the Practice bidding for the site should its other option not come to fruition.
- 3.23 It is recommended that
- (a) the current position in relation to the Park Lane doctors' surgery is noted,
  - (b) agree the proposed direction for a creation of a multi-use "hub" on either the Waldegrave Road or Elleray Hall sites, with the remaining sites being sold in the open market to meet the costs of the new building.
  - (c) Note that further public consultation will be undertaken and a further report brought to Cabinet with a final recommendation of the preferred option and its funding.

### **Strathmore School**

- 3.24 This site was vacated in December 2017 (and is shown on the plan at Appendix K). It had originally been thought that this site would be surplus to operational requirements and would be sold to help fund the REEC project. Achieving for Children has since identified that the site might be suitable to provide additional Special Education Needs (SEN) provision. The preparatory work in preparing the site for sale has therefore been put on hold.
- 3.25 AfC will be undertaking a design/feasibility exercise to determine what the site is able to support and if necessary, establish a business case. Options will be sensitively designed to reflect the surrounding area. It is recommended that
- (a) AfC explore the potential to establish a SEN provision on the site and a further report is brought to Cabinet on the proposal to either establish a SEN on the site or on the proposed timing and approach of the sale of the site.

### **Richmond Old Town Hall/Richmond Lending Library**

- 3.26 In 2015 the Council commissioned a study of these two buildings with the aim of considering the potential to improve the service offer and the scope to deliver additional arts, cultural and library service opportunities. Any proposal will be dependent on generating sufficient funding to cover any adaptation works required and overall be revenue-neutral.
- 3.27 Further work is required but there could be scope (for example) to look at options that consolidate library uses at the Richmond Lending Library at Little Green which could free up space at the Old Town Hall to facilitate a wider cultural offer. A key objective could also be to ensure the Richmond Museum is more visible and accessible.
- 3.28 It is recommended that a feasibility study be commissioned to review options to improve the library, cultural and museum offer across the Old Town Hall and Richmond Library sites.

### **Hampton Square**

- 3.29 In 2013 the Council commissioned a study to explore options for a wider generation or improvement of Hampton Square. Officers from Property Services have reviewed these previous proposals and believe they are financially unviable and therefore undeliverable. Options for further area regeneration, beyond the Uplift Programme to create Hampton Square itself, are further constrained as some of the key assets needed for a comprehensive review are either owned by or leased to third parties.
- 3.30 Despite these constraints there may still be scope for further improvements and it is recommended that a feasibility study is commissioned to identify any opportunities for further improvement around Hampton Square.

### **Funding and capacity**

- 3.31 To progress the above and other key cases considerable external consultancy support is required. The range and level of support differs for each case but typically architects, planning consultants, valuers and considerable legal and technical due diligence.
- 3.32 There is no dedicated consultancy budget at present and this is limiting the pace and scale of progress that is possible.
- 3.33 A breakdown of the estimated costs by project are set out in Appendix B which totals £613,000 (excluding Richmond OTH & Library). In the event of a capital budget being approved or a sale(s) being achieved where these costs can be off-set against capital. If though a scheme should be significantly amended or cancelled, then these costs will remain a revenue cost. It should be noted that there is no revenue budget identified to meet such costs.

- 3.34 It is also suggested that an “administration fee” of 4% be applied to capital receipts and that certain professional fees (such as design) are recovered from purchasers. This will slightly reduce the capital receipt but cover the costs of sale and generate some revenue to support future projects.
- 3.35 This programme is an ambitious one however it is considered that there is sufficient officer capacity at present to manage the agreed projects. If new projects, such as Richmond Old Town Hall are to be progressed it may be necessary to employ additional, fixed term staff to ensure they can be delivered and this would form part of any business case.

### **Conclusion**

- 3.36 This report sets out the recommended actions required to ensure robust decision making and effective delivery of future disposals. It also identifies the resources required to ensure that projects are successfully delivered.

## **4. FINANCIAL IMPLICATIONS**

- 4.1 Where disposals are based on historic decisions each of these should be reconfirmed as being in the best financial interests of the Council before disposal progresses. These will need to be reviewed and confirmed in conjunction with the Director of Resources on a case by case basis.
- 4.2 The revised projected receipts are in excess of those anticipated in the Capital Programme reported to February 2018 Cabinet, which did not assume any receipts after 2018/19. Any new receipts in excess of those previously considered will be used to reduce the need to borrow to support the Programme.
- 4.3 Capital Receipts can only be used to fund capital expenditure under proper accounting practice. However, there are two exceptions enabled by Government. One is where there is one-off spend to fund efficiency projects which is covered by the Flexible Use of Capital Receipts policy and the other is the ability to charge revenue disposal costs (e.g. advertising, legal fees etc.) up to 4% of the value of the final receipt against the anticipated receipt.
- 4.4 Feasibility costs are deemed to be revenue costs until such time as a capital project progresses. If any disposal of assets does not conclude the abortive costs incurred will remain as revenue expenses. It is therefore necessary to identify revenue resources to fund any such costs that can't be legitimately capitalised. It is highly likely that costs incurred in preparing an asset for sale will fall into a different financial period than any subsequent receipt from the disposal. As a result, it will be necessary to keep the disposal pipeline under review and regularly consider both the capital and revenue impacts.

- 4.5 Where capital receipts have been ring fenced for certain purposes as part of the decision to dispose the level of resources actually ring-fenced and therefore available will need to be net of any disposal costs charged against the capital receipt to ensure no additional financial pressure falls to the Council.

## **5. PROCUREMENT IMPLICATIONS**

- 5.1 All sales will be undertaken in accordance with the Disposals Procedure and best practice to ensure the Council's obligation to obtain the best price reasonably obtainable is achieved.

## **6. LEGAL IMPLICATIONS**

- 6.1 The council holds land for various purposes relating to the discharge of its functions. Where the land is no longer required for such purposes, the Council can declare such land surplus to requirement subject to concluding a proper and reasonable analysis of whether the land is required for any other purposes of the council. Such process requires the council and its officers to come to a decision acting reasonably in a *Wendesbury* reasonable sense, i.e. that the decision takes into account all relevant matters and disregards all irrelevant matters and is not so unreasonable that no other local authority could have come to that decision. This paper identifies that any decisions relating to declaring land surplus to requirement shall take into account council objectives, policies and legal duties. The Council is also required to take into account its fiduciary duty when making such decisions and this report sets out the obligations to be discharged in this respect.
- 6.2 Generally, where land is declared surplus to requirement following a due and reasonable assessment of whether the land is no longer required for the purposes for which it is held, the Council is empowered by section 123 of the local Government Act 1972 to dispose of land held by them in any manner they wish but not for a consideration less than the best that can be reasonable obtained. It is anticipated that the disposals strategy will satisfy this requirement. Where land is held for a specific statutory purpose e.g. education, any proposed disposal will need to adhere to any legislative requirements for disposal, such as secretary of state consent.
- 6.3 The Council members, cabinet and officers are obliged at all times to act in accordance with their fiduciary duty, i.e. to act with reasonable care, skill and caution and with due regard to the interests of the taxpayers. In view of the fiduciary duty and the general requirement of reasonableness, the Cabinet should approve the recommendations only if they consider, on a rational basis and having fully considered the officers' advice, the identified benefits of the matters contained in this report are such that they outweigh the identified risks and that those risks are not, in themselves, unreasonable.

**7. CONSULTATION AND ENGAGEMENT**

7.1 There has been consultation over the Teddington proposals. Where specific consultation is considered necessary this will be undertaken but it is expected that generally on the sale of land that consultation is largely undertaken via the planning process.

**8. WIDER CORPORATE IMPLICATIONS**

<b>8.1 POLICY IMPLICATIONS/CONSIDERATIONS</b>
These proposals will support the Council’s aim in terms of ensuring assets are properly used and bring a number of underused or disused sites into beneficial use.
<b>8.2 RISK CONSIDERATIONS</b>
The sale of sites contains risks in terms of market conditions but also ensuring sales are managed effectively to ensure the early possible completion and maximization of capital receipts. The Disposals Procedure and the general best practice exercised by officers will minimise these risks.
<b>8.3 EQUALITY IMPACT CONSIDERATIONS</b>
None at this stage but will be considered for those proposals where there is a direct impact on service users or the wider public (such as Teddington proposals or the proposed SEN provision at Strathmore School)
<b>8.4 ENVIRONMENTAL CONSIDERATIONS</b>
All development that arises from the sale or use of these sites will meet the Council’s Planning Standards in relation to environmental issues.
<b>8.5 DIGITAL IMPACT ASSESSMENT/CONSIDERATIONS</b>
There are no specific digital considerations associated with this report.

**9. BACKGROUND INFORMATION**

**10. BACKGROUND PAPERS**

**11. APPENDICES**

- Appendix A Disposals Procedure
- Appendix B CONFIDENTIAL – Capital receipts estimates
- Appendix C Site plan – Meadows Hall



Appendix D	Site plan – Friars Lane car park
Appendix Ei	Site plan – Nursery site adj Strathmore Centre
Appendix Eii	Site plan – Strathmore Centre site
Appendix F	Site plan – Garden Cottage, Orleans Road
Appendix G	Site plan – North Lane East Car Park
Appendix H	Site plan – Former North Lane depot
Appendix I	Site plan – Elleray Hall
Appendix J	Site plan – 4 Waldegrave Road
Appendix K	Site plan – Strathmore School

## 12. CONTACTS

**Councillor Fleming**

**Joint Deputy Leader and Cabinet Member for Environment, Business and Community**

[cllr.pfleming@richmond.gov.uk](mailto:cllr.pfleming@richmond.gov.uk)

**Andy Algar**

**Assistant Director, Property Services**

[Andy.algar@richmondandwandsworth.gov.uk](mailto:Andy.algar@richmondandwandsworth.gov.uk)

## **APPENDIX TWO**

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16/6 Cttee

**PLANNING REPORT**

Printed for officer by  
Miss Saba Hadi on 7 September 2010

**Application reference: 10/2420/FUL**  
**FULWELL, HAMPTON HILL WARD**

Date application received	Date made valid	Target report date	8 Week date
20.08.2010	<del>20.08.2010</del>	<del>19.11.2010</del>	<del>15.10.2010</del>
	6.9.10	6.12.10	1.11.10

**Site:**

Stanley County Junior & Infant School, Stanley Road, Teddington, TW11 8UE

**Proposal:**

Amalgamation and expansion of two existing three form entry schools, Stanley Infants School and Stanley Juniors School, to form a new combined four form entry Primary School, with the addition of two new features: an Autistic Spectrum Unit and a Childrens Centre to includes new build accommodation and reconfigured existing areas.

Status: Pending Consideration (If status = HOLD please check that all is OK before you proceed any further with this application)

**APPLICANT NAME**

Ms Shirley Clifford  
Civic Centre  
44 York Road  
Twickenham  
Middlesex  
TW1 3QB  
UK

**AGENT NAME**

Mr Hugo Braddick  
Studio 1A  
33 Greenwood Place  
London  
NW5 1LB  
United Kingdom

DC Site Notice: printed on ~~27.08.2010~~ and posted on <sup>8.9.10</sup> and due to expire on <sup>17.9.10</sup> ~~27.08.2010~~ <sup>8.10.10</sup>

**Consultations:**

**Internal/External:**

**Consultee**

LBRUT Trees Preservation Officer  
Environment Agency  
LBRUT Environmental Health Contaminated Land  
LBRuT Ecology  
LBRUT Transport  
Network Rail  
LBRUT Sustainability  
LBRUT Urban Design 14 Days  
LBRUT Environment Policy And Design  
LBRUT Leisure Services  
Sport England - London Region

**Expiry Date**

20.09.2010  
20.09.2010  
20.09.2010  
27.09.2010

**Neighbours:**

Health Clinic, Stanley Road, Teddington, TW11 8UE, - 07.09.2010  
161A Stanley Road, Teddington, TW11 8UF, - 07.09.2010  
69 Strathmore Road, Teddington, TW11 8UH - 07.09.2010  
65 Strathmore Road, Teddington, TW11 8UH, - 07.09.2010  
Second Floor Flat, 161 Stanley Road, Teddington, TW11 8UF, - 07.09.2010  
Flat 5, 228 Stanley Road, Teddington, TW11 8UE - 07.09.2010  
76 Clonmel Road, Teddington, TW11 0SR, - 07.09.2010  
78 Clonmel Road, Teddington, TW11 0SR, - 07.09.2010  
Junior Training Centre, Strathmore Road, Teddington, TW11 8UH - 07.09.2010  
Flat 2, 161 Stanley Road, Teddington, TW11 8UF, - 07.09.2010  
Flat 1, 161 Stanley Road, Teddington, TW11 8UF, - 07.09.2010  
Flat 4, 232 Stanley Road, Teddington, TW11 8UE, - 07.09.2010  
Flat 3, 232 Stanley Road, Teddington, TW11 8UE, - 07.09.2010  
Flat 2, 232 Stanley Road, Teddington, TW11 8UE, - 07.09.2010



9 Strathmore Road, Teddington, TW11 8UJ, - 07.09.2010  
 6 Strathmore Road, Teddington, TW11 8UJ, - 07.09.2010  
 4 Strathmore Road, Teddington, TW11 8UJ, - 07.09.2010  
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 3 Strathmore Road, Teddington, TW11 8UJ, - 07.09.2010  
 2 Strathmore Road, Teddington, TW11 8UJ, - 07.09.2010  
 Cemetery, Shacklegate Lane, Teddington, TW11 8SH, - 07.09.2010

**History: Development Management, Appeals, Building Control, Enforcements:**

<u>Development Management</u> Status: GTD Date:05/02/2004	Application:03/3711  Erection Of Football Pavilion With Changing Rooms For Male And Female Use Including Mobility Provision, Mobility Parking Area And New Vehicular Entrance And New Pedestrian Entrance On Strathmore Road
---	--

<u>Development Management</u> Status: GTD Date:29/06/2004	Application:03/3865  Erection Of Six Floodlighting Columns To Proposed Multi Use Games Area
---	---

<u>Development Management</u> Status: GTD Date:11/02/2004	Application:03/3866  Remove Part Of Existing Play Area And Construction Of Multi Use Games Area With Fences
---	---

<u>Development Management</u> Status: GTD Date:14/07/1994	Application:94/1304/FUL  Erection Of New Library And Resource Based Learning Facility
---	---

<u>Development Management</u> Status: GTD Date:27/08/2004	Application:04/1844/FUL  Erection of new changing room
---	--

<u>Development Management</u>	Application:10/2420/FUL
-------------------------------	-------------------------

Status: PCO

Date:

Amalgamation and expansion of two existing three form entry schools, Stanley Infants School and Stanley Juniors School, to form a new combined four form entry Primary School, with the addition of two new features: an Autistic Spectrum Unit and a Childrens Centre to include new build accommodation and reconfigured existing areas.

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Building Control

Stabilisation of boundary wall

Deposit Date:

10.03.1995

Reference:

95/0262/FP

---

Building Control

New internal partition between library and bookshop

Deposit Date:

07.06.1995

Reference:

95/0381/FP

---

Building Control

New classroom for infants

Deposit Date:

17.10.1995

Reference:

95/1278/FP

---

Building Control

Construction of single storey classroom

Deposit Date:

07.08.2006

Reference:

06/1653/IN

---

Building Control

Deposit Date:

01.09.2010

Reference:

10/1719/FP

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**Constraints:**

**Recommendation:**

The determination of this application falls within the scope of Officer delegated powers - ~~YES~~ / NO

**I therefore recommend the following:**

- 1. REFUSAL
- 2. PERMISSION
- 3. FORWARD TO COMMITTEE

Case Officer (Initials): .....

RS

Dated: .....

**I agree the recommendation:**

Team Leader/Development Control Manager

Dated: .....

This application has been subject to representations that are contrary to the officer recommendation. The Development Control Manager has considered those representations and concluded that the application can be determined without reference to the Planning Committee in conjunction with existing delegated authority.

Development Control Manager: .....

Dated: .....

<b>REASONS:</b>
<b>CONDITIONS:</b>
<b>INFORMATIVES:</b>
<b>UDP POLICIES:</b>
<b>OTHER POLICIES:</b>

The following table will populate as a quick check by running the template once items have been entered into Uniform

**SUMMARY OF CONDITIONS AND INFORMATIVES**

<b>CONDITIONS:</b>	
<b>INFORMATIVES:</b>	

**ADDITIONAL NOTES CONTINUED FROM ABOVE:**



**Professional Comments:**



10/2420/FUL  
STANLEY INFANT & JUNIOR SCHOOL  
STRATHMORE ROAD  
TEDDINGTON

TEDDINGTON WARD  
Contact Officer:  
R Summers



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**Main Development Plan Policies:**

London Plan Policies: 2A.1, 9, 3A.18, 24, 3C.1, 2, 3, 23 4A.1, 3, 4, 7, 13, 14, 16, 4B.1, 2, 5, 12;  
Unitary Development Plan First Review policies: ENV 12, 35, BLT 11, 14, 15, 16, TRN 2, 4;  
Proposal D11; Core Strategy policies: CP 1, 2, 3, 4, 7, 18; Development Management DPD  
policies: DM SD1, 2, 4, 6, 7, OS 5, TP2, DC1, 4, 5

**SUMMARY OF APPLICATION**

The proposal seeks to provide a solution to the strong demand for primary school places in a sustainable & well designed format. It is considered that it will provide enhanced educational facilities without compromising the quality of the environment whilst recognising that there will inevitably be extra traffic attracted to the site. Efforts have made to mitigate the impact of this by on site car parking & Travel Plan initiatives. The scheme meets relevant policy requirements for sustainable & renewable energy, accessible needs & with relevant conditions will not compromise the treescape or ecology of the site.

**RECCOMENDATION: PERMISSION**

**SITE DESCRIPTION & PROPOSAL:**

1. The school site is roughly rectangular in shape fronting Stanley Road for some 66m & Strathmore Road for 200m; the latter being the main vehicular & pedestrian accesses to the

site. The junior school centres on the building complex on the west side of the site with the infants based at the east end with a large open space comprising a grassed U14 football pitch between them. There are other buildings on site for sports usage, a caretakers flat plus temporary classrooms.

2. Both schools are 3FE [3 form entry]; 360/270 pupils in the junior/infants respectively plus a 10 place SEN unit & 26 place nursery; thus a total pupil number of 666 with 94 staff in total. There is on site car parking on both parts of the site, with the larger car park at the east end serving both schools. These provide some 20 spaces.
3. The proposal is to provide a 4FE by combining the two schools into one comprising 840 pupils, plus 39 place nursery, ASC [autistic spectrum] unit for 22 full time spaces & a new children's centre. Total pupil numbers would be around 900 & staff would increase to approximately 118. A revised east car park would accommodate 32 spaces plus mini bus parking with the western smaller car park removed to facilitate space to build the children's centre & nursery.
4. To accommodate the additional school places various work is proposed which in summary comprises two storey & single storey front extensions to the main junior school; a new freestanding part single part two storey classroom block along the Strathmore Road frontage, a separate single storey classroom for the ASC at the east end converted from an existing building; & a two storey building in the south west corner to accommodate the nursery & children's centre. The current grass pitch would be turned through 90 degrees to ensure it is reprovided as part of the overall project.
5. Building materials are primarily brick, exact type to be agreed, with metal acoustic louvres under metal framed fenestration.
6. A number of trees would be removed to enable the scheme to proceed with mitigation planting being shown in a submitted landscaping drawing. There are a number of other reports including Travel Plan & Transport statement.
7. There are no specific open space protection policies relating directly to the site although Strawberry Hill golf club beyond the railway line to the north is MOL & the cemetery to the east boundary of the school is OOLTI [other open land of townscape importance]. It is noted that the school is within an area poorly provided with public open space [ENV 12] & the site is the subject of proposal D11 which seeks community use of the open space facilities.
8. On the opposite side of Strathmore Road [the east-west arm] there are 8 houses, the currently vacant Council owned Strathmore Centre & a small office building near the junction with Stanley Road. The road is one way with cars exiting onto Stanley Road. The north-south continuation of Strathmore Road is wholly residential.
9. The applicant advises there are a number of non school community activities which occur at the site including use of the grass pitch, MUGAs & other parts of the school.

#### **PUBLIC & OTHER REPRESENTATIONS**

10. The Environment Agency does not object in principle but requires further information before confirming the scheme is satisfactory
11. Sport England does not object to the re-configured sports pitch subject to conditions to ensure the new pitch is properly laid out in an equally useable format as the new eastern end is currently hard surfaced.
12. One neighbour advises residents rely on the road for parking & hope the scheme will not

result in any further parking restrictions.

13. Another neighbour, whilst not objecting in principle, is concerned that the new 2 storey building will cause overlooking & block the open aspect of the site to the detriment of the public. It is recommended the building be moved to the north side of the site.

**Professional Comments:**

14. The main planning issues are as follows: land use; design; transport; impact on neighbours & other matters including trees, ecology, sustainability & flood risk.

**Land Use**

15. Policy CP 18 [Education & Training] encourages the improvement of educational facilities, subject to compliance with other policies, where required by the community. The site is clearly in education use & it is well known that there is a high demand for primary places generally in the Borough & in Teddington in particular which will not be met by other school expansions currently under way. CP18 advises that the potential of existing education sites will be maximized through redevelopment, refurbishment &/or re-use.
16. However, this is a substantial change to the numbers of pupils currently being accommodated on the site. Going from 3FE to 4FE plus enlarged nursery, ASC & new children's centre increases heads from about 666 to 900 & staff from 94 to 118. These figures have been provided by the applicant & advisors.
17. The main impact of this increase manifests itself in new buildings across the site which is dealt with in the following paragraphs. The main issue in terms of impact on the area however is likely to be the traffic generation, both pedestrian & vehicular, from the significant increase in pupil numbers in particular & this is also considered below under the relevant heading.
18. Community uses will be retained on the site although a small indoor learner pool will be displaced. The former is supported, the latter is unfortunate. However, the Council's Head of Sports & Fitness advises that the pool is below recommended minimum standards with limited disabled access. Other pools in the area offer sufficient supply to ensure the loss is not harmful & as such, given this advice, it is not felt it will cause harm to the locality.

**General Design**

19. Policies BLT 11, CP 7 & DC 1 seek to ensure new development responds positively to the locality into which it is to be built. This follows Government policy PPS1 & is also set out in the Council's Design Quality SPD. In essence new build should be inclusive, respect distinctive local character & be based upon an understanding of what makes the quality of its surroundings. .
20. The north side of Strathmore Road is dominated by the school & the open views through the site. The south side is a mixture of uses & is generally at two storeys with housing predominating. There are no specific designations with regard to Conservation Areas, Listed Buildings or Buildings of Townscape Merit.
21. The school buildings are a mixture of styles, ages & heights with the main frontage building dating from the interwar period. It is brick on two storeys with over sailing tiled pitched roof.
22. The agent advises the scheme is designed to bring more coherence to the site & provide a stronger identity for the school emphasising the location of the entrances & concealing the more piecemeal link buildings & additions which have accrued over the years. A contemporary design approach is being pursued with similar materials to the existing, brick, but of a different colour, blue/brown is suggested. This contrast is intended to demonstrate

another phase in the continuing development of the site overtime.

23. The roof forms will generally be flat to provide clean lines to the new buildings with the freestanding two storey block being more articulated with different heights & roof forms.
24. It is noted that the proposal is different to the main school in terms of the new distinctive design although in terms of scale it reflects the size of the main existing complex. Part of it comes to the back edge of the footpath resulting in the removal of trees [see Tree section below which considers this] & this is a new concept as the current buildings lie back from the road. However, there is no strong building line to the site &, if handled well, there is no objection to this projection forward.
25. The partial filling in of the open space along Strathmore Road has been the subject of discussion at the pre application stage. Initially it was proposed to provide a single storey building filling much of that space & resulting in the removal of attractive trees. Officers sought to minimise the loss of openness, which is a feature of the road, by suggesting the building goes upwards, if it could not be sited elsewhere, to provide views on both sides of the new build & allowing the trees to be retained.
26. Whilst the neighbour's comments are noted, as the land is not specifically protected by an open space designation, it is considered unreasonable to press for a wider view across the site. Irrespective of the above it is worth noting that Planning cannot protect an individual's views across some one elses land. However, it is not unreasonable to ensure that the open character of the area is given protection in the public interest. An acceptable solution has been achieved in your officers' opinion.

#### Transport

27. The proposal seeks a substantial increase in pupil numbers & consequently an increase in staff. Moreover, the addition of a children's centre will add to the activity. The applicant has sought to deal with this through the revised Travel Plan & car spaces on site. Currently the car parks are not optimal whereas the current scheme provides 32 plus mini bus spaces in a more formal & useable layout.
28. Transport colleagues have assessed the submissions relevant to traffic & remain concerned that the scheme is likely to create a situation which will be difficult to manage satisfactorily. This is probably the most contentious part of the scheme notwithstanding the efforts the school has made to mitigate harm.
29. The reports & further advice submitted suggests 118 staff will be employed on site for all the school uses. It is anticipated that peak staff numbers at any one time will be 86. The existing staff survey suggests there will be a need for 42 car spaces in total. 32 are provided. Officers consider that the figure of 42 is optimistic thus the short fall on site could be more then the suggested 10. However, site visits do show that there is surplus on street parking available in the immediate vicinity of the site. Moreover the applicant will seek to reduce staff coming by car via the Travel Plan. Whilst recognising the applicant's attempts to deal with staff parking the likely scenario is that there will be more competition for on street parking. It should be noted that staff parking will be during the day whereas resident parking is more likely in the evening periods. There is thus a degree of 'dual' use of the street parking. In conclusion, the known educational pressure for places has to be weighed up against more on street parking. It is not within a CPZ so permit controls cannot be exercised in this case & thus the scheme will impact on the local road as described above. Members will need to judge whether the school's needs outweigh this issue. It is interesting to note only one resident has raised this as a potential problem.
30. The school is currently erecting a number of covered cycle space for staff to increase the

possibilities of more sustainable modes of transport to & from the site. Whilst shown on the submitted plans they are being built as permitted development under a different source of funding. This is to be welcomed.

31. Coupled with longer term kerb side parking is the increase in numbers of children being brought by car. It is submitted that 90% of pupils will live within 2 km of the site thus suggesting there is scope for walking/scooting/cycling/car sharing. The Travel Plan can be a condition of the permission; currently there is no Planning control with regard to this matter & thus there is an opportunity to apply more pressure to reduce car borne pupils. However, it must be recognised that the additional form entry with the new children's centre [20 children likely] will have an impact on traffic flows near to the site during those periods when pupils are being delivered/collected.
32. Access to the site for construction purposes is not usually a Planning matter given other legislation covers much of this discipline. However, due to the relatively narrow one way access, past residential properties, a condition is recommended to require the applicant to provide a Construction Method Statement.

#### Impact on neighbours

33. Policies BLT 16 & DC5 seek to balance new development with existing residential amenity. The new freestanding building is on average 25m [22m at its nearest] from the houses on the south side of the road. Local Planning Authority SPD guidance normally requires a minimum of 20m between habitable windows to protect privacy. Given that the proposal is two storey this distance is sufficient to ensure there is no material harm in terms of overlooking, light loss or general unneighbourliness.
34. There will inevitably be a significant increase in activity around the school site but this is clearly not a new feature to the area. It will take different forms but the principle one is that of parents delivering & collecting children. Whilst the Travel Plan etc will seek to mitigate some of this extra activity it must be recognised that it normally only occurs at around 9.00 & 15.00 each school day for about 30 minutes. Whilst this can be harmful to amenity it is for a relatively short period &, given the need to provide further education places & the fact that the school is a long established use, it would be unreasonable to resist the application on this basis.
35. Additional staff parking is likely to occur & this has been discussed above. It will almost inevitably lead to some further on street parking but site visits have shown that there is some available parking on the road. In these circumstances the loss of amenity from extra kerb side parking, whilst noted, is not likely to be of sufficient size to justify refusal. The education need also needs to be given weight. It is interesting to note that there has been little third party objection to this aspect of this proposal.

#### **Other Matters**

##### Landscaping:

36. Policies ENV 9, 19, CP 4 & DC 4 apply. Several trees are to be felled to accommodate the scheme. A lesser number of new trees are proposed. Officers have expressed concerns about the loss of some of these trees & have suggested amending the scheme accordingly. This has been the subject of negotiation & the current scheme is the outcome. Whilst it is regrettable some of the trees, particularly in the south west corner, cannot be retained it is recognised that a balance has to be struck between accommodating the required buildings & protecting the key trees & planting.
37. subject to planning conditions to ensure the retention of those trees now to be kept, particularly with regard to root protection & building development pressure, it is considered that the correct balance has been achieved.

38. The applicant has submitted an ecological report &, whilst no protected species have been found on that part of the site the subject of this application, it is nevertheless proposed to carry out ecological enhancements of the site including bird & bat boxes. Your ecologist recommends a precautionary approach be taken as the trees may be offering roosts etc. This initiative is to be encouraged & a condition is recommended accordingly which should also be used to enhance the nature conservation value of the site.

#### Flood risk

39. The Environment Agency has no objections as the extension will be sited in Flood Risk Zone 1, the least affected by flood risk. However, recommendations made by the EA has been passed onto the applicant to consider & will form a condition if planning permission is forthcoming.

#### Sustainable Design/Construction

40. Policies CP1, 2 & SD 1, 2, & 4 & the Sustainable Construction Checklist SPD require applications to reach 'Excellence' under the BREEAM standards with a 20% CO2 emissions reduction through the use of renewables.

41. The applicant has submitted an initial BREEAM report which concludes that meeting 'excellence' [72%] can be met. However, more recent information suggests there may be a difficulty in achieving this & that it is more likely 'Very Good' is attainable. Thus the applicant has requested the scheme be conditioned to meet 'Very Good' rather than 'Excellent'. However, no detailed explanation has been given at this stage & it is therefore felt appropriate to condition it to 'excellent'. If this is not possible it is open to the applicant to seek to vary the condition with a case to demonstrate why the level has to be reduced.

42. The scheme will use ground source heat pumps [GSHP] & PVs to meet the 20% carbon off set in accordance with the relevant planning policies. Conditions are recommended particularly with regard to the GSHP to ensure they will not cause harm to water run off etc.

#### Soil Contamination

43. A report has been submitted & assessed by your specialist. Whilst the scheme can proceed a further report is recommended with regard to the soft landscaped areas only. A condition is recommended.

#### Conclusion

44. The proposal seeks to provide a solution to the strong demand for primary school places in a sustainable & well designed format. It is considered that it will provide enhanced educational facilities without compromising the quality of the environment whilst recognising that there will inevitably be extra traffic attracted to the site. Efforts have made to mitigate the impact of this by on site car parking & Travel Plan initiatives. The scheme meets relevant policy requirements for sustainable & renewable energy, accessible needs & with relevant conditions will not compromise the treescape or ecology of the site.

I therefore recommend that **PERMISSION** be granted subject to the following condition & informative:

#### **Standard Conditions**

- AT01 - Development begun within 3 year
- BD05 - Details of materials to be approved
- BD10 - Sample panel of brickwork
- DV29D - Potentially contaminated site
- DV 48 - Approved drawings '09090-01B, 002B, 003A, 004B, 005A, 006A, 007B, 008A, 009B, 010B, 101E, 102K, 103F, 104H, 105G, 106D, 107A, 108A, 109, 110L, 111J,

112M, 113K, 114M, 115L, 116E, 117B, 118C, 200F, 201H, 202G, 203G, 204K, 205G, 300H, 301F, 302J, 310, 311, 400D, 402D, 403E'

- DV46 - BREEAM 'Excellent'
- LT01 - Location of trees
- LT02 - No felling or lopping
- LT03 - Protect trees
- LT05 - Soil compaction 'retained trees'
- LT06 - Tree planting
- LT09 - Hard & soft Landscaping
- LT10 - Landscaping maintenance
- LT13 - Protect major roots
- LT14 - Hand excavation '50mm'
- LT15 - Site supervision
- ST03 - site lines
- ST05 - Vehicular visibility
- NS01 - That prior to the occupation of the extension hereby approved a scheme providing bird & bat boxes in the area of the extension shall be submitted to & be approved by the Local Planning Authority. The approved scheme shall be carried out as part of the development hereby approved. Reason: to protect & enhance the nature conservation of the locality.
- NS03 - No development shall take place unless otherwise agreed in writing with the Local Planning Authority, including any works of demolition, until a construction method statement has been submitted to, and approved in writing by the LPA. The approved statement shall be adhered to throughout the construction period. The statement shall provide for: i) routing of construction vehicles and holding areas for these on site; ii) the parking of vehicles of site operatives and visitors; iii) the loading and unloading of plant and materials; iv) the storage of plant and materials used in constructing the development; v) the erection and maintenance of security hoarding; vi) measures to control the emission of dust and dirt during construction; vii) a scheme for recycling and disposing of waste resulting from demolition and construction work. REASON: To protect the amenities of the area and to ensure that the development does not prejudice the free flow of traffic.
- NS04 - Notwithstanding the annotation 'resin bound gravel' around Blocks 1 & 4 details shall be submitted to & be approved by the Local Planning Authority & the development shall not be carried out other than in accordance with those details: external hardsurfacing materials which must be of a permeable nature. REASON: to protect the long term health of the existing treescape.
- NS05 - Prior to the commencement of the development, –a detailed assessment of ground conditions of the land proposed for the sports facility shall be undertaken (inc drainage and topography) to identify constraints which could affect playing field quality; and –based on the results of this assessment to be carried out pursuant to the above, a detailed scheme to ensure that the playing fields will be provided to an acceptable quality shall be submitted to and approved in writing by the LPA after consultation with Sport England. Reason: to ensure that site surveys are undertaken for the replacement playing field & that any ground condition constraints can be & are mitigated to ensure provision of an adequate quality playing field.
- NS06 - The playing pitch shall be constructed and laid out in accordance with the planning application drawing No 0909-104 and the standards and methodologies set out in the Design Guidance note " Natural Turf for Sport" and made available for use prior to the occupation of the new development. Reason: To ensure the quality of the pitch is satisfactory & is available for use prior to the occupation of the new development.
- NS07 - That details of the GSHP borehole layout shall be submitted to & be approved by the Local Planning Authority & the approved work shall be carried out as part of the development hereby approved Reason: to ensure the GSHP do not cause any harm to SUDS or other land

- NS08 - Travel Plan Staff and customer/visitor travel surveys shall be undertaken in accordance with a survey methodology to be submitted to and agreed by the Local Planning Authority prior to it being carried out. Within 3 months of the use commencing, a new travel plan based on the results of the survey shall be submitted with clear objectives, targets and actions for achieving a shift to more sustainable transport modes. Following approval by the Local Planning Authority, the applicant shall then implement these actions to secure the objectives and targets. The travel plan (including surveys) must be annually revised and a written review of the travel plan submitted and approved by Council by the anniversary of its first approval and yearly thereafter. At the third anniversary, the travel plan (including surveys) shall be re-written, submitted and approved by Council. This review and re-write cycle shall continue
- NS09 - That details shall be provided to & be approved by the Local Planning Authority as to how attenuation of surface water run off will be dealt with in an acceptable manner & such approved details shall be carried out as part of the development hereby approved. Reason: to ensure water run off does not add unacceptably to the existing on site conditions.

**Standard Informatives:**

- IE05C - Noise Control-Building Site  
 IH06D - Damage to Public Highway  
 IL10A - Building Regulations
- IL16FA - Relevant policies 'London Plan Policies: 2A.1, 9, 3A.18, 24, 3C.1, 2, 3, 23 4A.1, 3, 4, 7, 13, 14, 16, 4B.1, 2, 5, 12; Unitary Development Plan First Review policies: ENV 12, 35, BLT 11, 14, 15, 16, TRN 2, 4, Proposal D11; Core Strategy policies: CP 1, 2, 3, 4, 7, 18; Development Management DPD policies: DM SD1, 2, 4, 6, 7, OS 5, TP2, DC1, 4, 5'
- IL19 - Summary reasons for granting planning permission 'See conclusion above'  
 IT06 - Nature conservation  
 NI01 - It is recommended that with regard to condition NS06 the pitch assessment & improvement/management scheme is undertaken by a specialist turf grass consultant.

**Background Papers**

- Application forms etc  
 Letters of representation



Notes of Telephone calls/discussions/meetings

DATE

ACTION

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## APPENDIX THREE

**Former Teddington Youth Centre & the Strathmore Centre, Strathmore Road,  
Teddington, TW11 8UH**

**Pre-application advice submission:**

Demolition of existing buildings, and redevelopment to provide 43 affordable housing units, re-provision of Scamps nursery accommodation; onsite parking and alternations to access.

**Officer:** Lucy Thatcher

**Meeting date:** Tuesday 16 October 2018

**Site Description**

Strathmore Road is accessed both off Stanley Road and Shacklegate Lane, and the application site is located on the east / west arm of the road. The site itself contains several standalone buildings, ranging from single to two storeys, with well-established landscaping within the buildings grounds. Strathmore Road extends into the site, along the east boundary, which is traffic calmed, lit, and benefits from a wide pavement adjacent.

The site has an existing social infrastructure use. Whilst the Strathmore Centre (to the north of the site) is disused, to the south of the site is a single storey Scamps Nursery, which provides a complete range of child-care services for children up to and including Year 6, as well as acting as a nursery to pre-school aged children.

The surrounding area is predominately residential, with properties No. 9-63 Strathmore Road bordering the east boundary of the site, the flats at 1-8 Birdwood Close adjoining the south boundary, and No. 214-232 Stanley Road adjoining the west boundary. Stanley Primary school is sited opposite, to the north, in Strathmore Road.

There are no designated or non-designated heritage assets on or adjacent to the site. With regards to other specific site designations:

- Strathmore Road within the site is a publicly maintained highway;
- The area is poorly provided with Public Open Space and within an area proposed for Tree Planting
- It is on the Brownfield Land Register
- The site has an 'Site Allocation' within the Local Plan (SA 7):

*"Social and community infrastructure uses and/or an affordable housing scheme with on-site car parking are the most appropriate land uses for this site"*

The site allocation recognises there is an increasing need for the provision for childcare facilities and nurseries in the borough, and due to the sites location in a primarily residential area and its proximity to Stanley School and St James's school, it makes it ideal for the provision of nurseries and other child-care services. Therefore, a proposed redevelopment will only be acceptable if the current child-care provision is adequately re-provided in a different way, including the provision of appropriate outside space and parking related to the childcare services, or elsewhere in a convenient alternative location accessible to the current community it supports. Only if other alternative social or community infrastructure uses have been explored and options discounted in line with other policies in this Plan, would an affordable housing scheme with on-site car parking be considered as a potential redevelopment option.

Any redevelopment should have regard to the local character and objectives and general guidance as also set out in the Village Planning Guidance SPD for Hampton Wick and Teddington. The Village Plan sets out the following guidance for this specific site, which any development would need to consider:

- Account for the residential setting either side of the site, particular in terms of scale, height and massing as appropriate.
- The architecture in this area is mixed and contemporary design elements that respect and complement the local context would be appropriate, particularly accounting for Stanley Primary School and its modern architectural features that are sympathetic to the setting of the surrounding area.
- Access, parking and general transport arrangements of any potential uses should be considered, accounting for the low Public Transport Accessibility Level (PTAL) rating of the site.

### **Relevant Planning History**

There is limited planning history for the site, which is not deemed relevant to the assessment of this pre-application scheme:

- 02/1951: Erection Of 2 Relocatable Office Buildings and Associated Access Ramps And Railings. Approved
- 99/1475: Erect Demountable Classroom in The Grounds Of The Strathmore Centre As An Additional Teaching Block And For Use As An Out Of Schools And Holiday Playgroup Facility. Approved.
- 83/0938: Use of premises as playgroup 9 a.m. to 12.30 p.m. Monday to Friday for up to 32 children. (Variation of Condition (b) of planning permission No. 81/1291). Approved
- 81/1291: Use of premises as playgroup 9a.m. to 12.30 p.m., Monday to Friday for 20 children. Approved.
- 80/1521: Extension to main hall. Approved.
- 78/1041: Use of premises for playgroup purposes from 9 a.m. to 12.30 p.m. Monday to Friday for 20 children. Approved.
- 77/0819: Use of premises for playgroup purposes from 9 a.m. to 12.30 p.m. Monday to Friday, for 20 children. Approved.
- 74/0196: Erection of a garage for storage purposes in connection with the car maintenance classes. Approved

### **Proposal:**

The proposed development comprises a mixed nursery and residential redevelopment comprising:

- Demolition of existing buildings
- 43 residential units contained within three buildings:
  - Two 4-bedroom town houses with roof terrace and private gardens.
  - Eight 1-bedroom apartments.
  - Twenty-seven 2-bedroom apartments.
  - Six 3-bedroom apartments with gardens.
- 46 residential parking spaces on-site
- 1230sqm communal landscaping located in three areas (south, west and east of the site) in addition to site wide soft landscaping and privacy planting,
- 300sqm Scamps Nursery (to replace the existing use) with external play space,
  - 2 parking spaces associated with the nursery
  - 178m<sup>2</sup> wooded garden

### **Relevant Policies**

The Richmond Borough Local Plan and Supplementary Guidance and Documents are available to view on the Council's website [www.richmond.gov.uk](http://www.richmond.gov.uk). Consideration must also be given to

policies in the London Plan and National Planning Policy Statements. Key relevant local policies are summarised below.

### **Local Plan**

The Local Plan, incorporating the Inspector's Main Modifications, was adopted at Full Council on 3<sup>rd</sup> July 2018. The main Local Plan policies are as follows:

- LP 1 - Local Character and Design Quality
- LP 2 - Building Heights
- LP 8 - Amenity and Living Conditions
- LP 10 – Local Environmental Impacts, Pollution and Land Contamination
- LP 15 – Biodiversity
- LP 16 – Trees
- LP 17 - Green Roofs and Walls
- LP 20 – Climate Change Adaptation
- LP 21 – Flood Risk and Sustainable Drainage
- LP 22 – Sustainable Design and Construction
- LP 24 - Waste Management
- LP 28 – Social and Community Infrastructure
- LP 30 – Health and Wellbeing
- LP 31 – Public Open Space, Play Space, Sport and Recreation
- LP 34 – New Housing
- LP 35 – Housing Mix and Standards
- LP 36 – Affordable Housing
- LP 37 – Housing Needs of Different Groups
- LP 39 – Infill, Backland and Backgarden Development
- LP 44 - Sustainable Travel Choices
- LP 45 - Parking Standards and Servicing

Supplementary Planning Documents/Guidance and other guidance

- Design quality
- Planning Obligation Strategy
- Sustainable Construction Checklist
- Front Garden and Other Off Street Parking Standards
- Refuse and Recycling Storage Requirements
- Small and Medium Housing Sites
- Affordable Housing
- Mayor's Affordable Housing SPG
- Public Space Design Guide
- Village Plan

### **Professional comments:**

#### **1. Land use**

*In policy context, policy LP28 states the loss of social or community infrastructure will be resisted, and proposals involving the loss of such infrastructure will need to demonstrate clearly*

1. *that there is no longer an identified community need for the facilities or they no longer meet the needs of users and cannot be adapted; or*
2. *that the existing facilities are being adequately re-provided in a different way or elsewhere in a convenient alternative location accessible to the current community it supports, or that there are sufficient suitable alternative facilities in the locality; and*

3. *the potential of re-using or redeveloping the existing site for the same or an alternative social infrastructure use for which there is a local need has been fully assessed. This should include evidence of completion of a full and proper marketing exercise of the site for a period of at least two consecutive years in line with the requirements set out in Appendix 5.*

*Appendix 5 states, marketing reports should be included with any submission, and always involve a robust and active marketing campaign which should:*

- *Be ongoing for a minimum period of two continuous years.*
- *Be through a commercial agent.*
- *The property should be marketed on property databases, search engines and other relevant websites which focus on the sale or letting of commercial premises, which are free to view and easily accessible by prospective purchasers / tenants.*
- *Prices should be commensurate with the existing quality and location of the premises.*

*Specifically relating to schemes involving the loss of a social and community infrastructure, marketing must include the following:*

1. *Evidence that the facility is no longer needed. Evidence of meaningful engagement with service providers or a public disposal process would be required to demonstrate this.*
2. *Evidence that the loss of the facility would not have a detrimental impact on social and community service provision. For example, a marketing report could provide details of alternative facilities in close proximity and provide evidence that existing users have all been successfully relocated and that this has not resulted in any shortfall in provision.*
3. *Consideration should be given to the potential for adapting the site / premises to meet community needs either now or in the future.*
4. *Evidence should be provided to show that premises have been offered at a reasonable charge to appropriate user groups, e.g. at a discounted rate to community groups or voluntary organisations.*
5. *Where the site is an existing health facility, consideration should first be given to re-using the site for other health facilities before other social infrastructure uses. Applicants should contact NHS Property Services and Richmond CCG to discuss their needs for health floorspace in the area.*

*Where the Council is satisfied that the above evidence has been provided and the change of use away from social and community infrastructure use has been justified, redevelopment for other employment generating uses or affordable housing should be considered.*

*The justification for the policy does recognise that, if a public disposal process has taken place as part of an agreed programme of social infrastructure re-provision which confirms that the disposal of assets is necessary to ensure continued delivery of social infrastructure and related services, this will be taken into account. Further, where the Council is satisfied that the above evidence has been provided wholly affordable housing schemes would also be supported by the Council where other policy priorities are met to demonstrate wider benefits to meet community needs.*

*In addition to policy LP 28 requirements, SA 7 asks for social and community infrastructure uses and/or an affordable housing scheme.*

In terms of background for the site, this is owned by the LBRuT. Scamps (a nursery) currently operates from the southernmost building. The remaining part of the site was previously used by Richmond Social Services and a Youth Offending Centre. These latter two services closed several years ago as they were no longer required for this purpose or any other purpose that could be identified by the Council. Therefore, the buildings have remained shut (apart from the SCAMP's nursery) for over 7 years.

The site was declared surplus to the Council's requirement by Cabinet in November 2010 and the site has remained on the Council's disposal list, which is a publicly accessible document.

Again, in March 2018, the Council's Cabinet Members approved the following recommendations for the site:

- a) *The site is formally declared as being surplus to the Council's operational requirements;*
- b) *Officers finalise the design of the nursery and then agree terms with SCAMPS for their new lease at a market rent;*
- c) *Paragon be asked to progress its design and submit a final offer to the Council that is then independently assessed by the Council's valuers;*
- d) *That the Joint Deputy Leader – Environment, Business and Community, in consultation with the Assistant Director, Property Services, is given delegated approval to agree terms and conclude the sale of the land provided that the terms proposed represent market value (reflecting the restriction on the sites use to affordable housing).*

Since that time, periodic updates have been reported to the Council's Cabinet, which was done as recently as June 2018. In that time the applicants have confirmed no group has come forward and identified a need for a community facility and the Council's position has remained that it does not have a use for the buildings.

The applicants now indicate the existing nursery buildings are not fit for purpose and require significant investment and upgrade. Consequently, the application indicates since October 2017 SCAMPs, Achievement for Children (AfC) and Property Services have worked together to design a new nursery that would cater for SCAMP's requirements and the design has been incorporated into the applicant's scheme.

In terms of the assessment against Parts C 1 and 2 of policy LP 28, the submission confirms:

- Apart from the SCAMPS nursery, the other former social infrastructure services closed in 2010 as they were no longer required, and the Youth Offending Service relocated to Oldfield Road. Nor were alternative uses identified by the Council for the site, and therefore the buildings have remained shut (apart from the SCAMP's nursery) for over 7 years.
- Further, the scheme re-provides the existing nursery facilities on site within a new building of 300m<sup>2</sup> internal space, 178m<sup>2</sup> garden, and 2 parking spaces.

The scheme has therefore addressed Parts C 1 and 2, and demonstrate that there was not a need for the facilities since 2010 as they have remained empty and on the disposal list and the scheme re-provides the existing 'in use' facilities. Whilst this is welcomed, the applicants are advised to take on the following:

- It is encouragingly SCAMPs, AfC and Property Services have worked together to design a new nursery that would cater for SCAMP's requirements. Given the focus of the site allocation to ensure the current childcare provisions being adequately re-provided; it would be beneficial if the submission is accompanied with the statement confirming:
  - The existing accommodation does not meet their needs
  - The proposed internal and external space will fulfil their requirements and be fit for purpose.

Notwithstanding the above, the nursery building only occupies a small proportion of the site, and before releasing the remaining part of the site to housing, Part C3 of policy LP 28 and SA 7 needs to be demonstrated. It is evident that no formal marketing exercise has been undertaken in line with policy or Appendix 5, which is regrettable, and strictly reflects a departure to policy. However, in this specific circumstance, it is deemed that there may be exceptional circumstances to warrant an exception:

1. The scheme is not wholly for a residential scheme, and does provide some social infrastructure use on the site.
2. The site has been declared surplus, and has remained on the Council's disposal list, which is a publicly accessible document, and no group has come forward and identified a need for a community facility. Officers do however recommend:

- Any submission is provided with the links for a period of no less than 2 years demonstrating this is on the public disposal list
  - The public disposal process has taken place as part of an agreed programme of social infrastructure re-provision which confirms that the disposal of assets is necessary to ensure continued delivery of social infrastructure and related services
  - Confirm if there have been any discussions with partners regarding the re-use of the site for social infrastructure uses.
3. The scheme proposes a 100% affordable housing scheme, which is supported and welcomed, and as outlined in the following documents there is unequivocal need for such in the Borough. Notwithstanding such, it is recommended the officers later comments regarding mix, rent and nominations are addressed.
- a) The Local Plan highlights in the period from 2014 to 2033 a net deficit of 964 affordable homes per annum is identified in the Borough
  - b) The Infrastructure Delivery Plan (April 2017) highlights
    - i. Fewer than 13% of homes in the borough are in the social rental sector, the fourth lowest in London
    - ii. The Council's Housing Register as at March 2017 there were 2196 households on the Housing Register who have been assessed by the Council to be a reasonable preference category (i.e. having more acute needs). This total includes 201 homeless households for whom the Council accepts it has a duty (under the Housing Act 1996 S193 (2). Some households on the housing register face issues such as affordability in buying or renting at market levels, overcrowding and poor housing conditions'.
  - c) The Housing Market Assessment (2016) indicates the analysis shows with a 40% affordability threshold that there is a need for 906 dwellings per annum to be provided – a total of 17,215 over the 19-year period (2014-33).

## **2. Housing and Affordable Housing**

*The Draft London Plan sets a ten-year target of 8,100 new homes for Richmond (annualised average of 810). Policy LP 34 – Housing – sets a target of 3,150 homes for the period 2015-2025. This target will be rolled forward until it is replaced by a revised London Plan target. The Council will exceed the minimum strategic dwelling requirement, where this can be achieved in accordance with other Local Plan policies.*

*The Draft London Plan and the Mayor's Affordable Housing SPG provides a framework for delivering the maximum reasonable amount of affordable housing, setting a long term strategic aim of 50% on site affordable housing. Policy 3.11 of London Plan sets a target of 60% social and affordable rent: 40% intermediate rent or sale for new affordable homes. The priority should be for affordable family housing.*

*Policy LP 36 outlines the Council's approach to affordable housing:*

- a) *50% of all housing units will be affordable housing, this 50% will comprise a tenure mix of 40% of the affordable housing for rent and 10% of the affordable intermediate housing.*
- b) *the affordable housing mix should reflect the need for larger rented family units and the Council's guidance on tenure and affordability, based on engagement with a Registered Provider to maximise delivery.*

*For the proposed site, the scheme generates the need for 50% on site provision. However, where possible, a greater proportion than 50% affordable housing on individual sites should be achieved. Where on-site provision is required, an application should be accompanied by evidence of meaningful discussions with a Registered Provider which have informed the proposed tenure, size of units and design to address local priorities and explored funding opportunities.*

*Where a reduction to an affordable housing contribution is sought on economic viability grounds, developers should provide a development appraisal to demonstrate that schemes are*



*maximising affordable housing. The developer will be required to underwrite the costs of a Council commissioned economic viability assessment.*

The scheme has been designed with PA Housing, and proposes 100% affordable housing, with a tenure mix of 79% affordable housing for rent and 21% intermediate housing, which is welcomed.

The paper confirms the affordable housing mix addresses the specific requirements of PA Housing and reflects the local need for large rented family units. However, this does not appear to be truly reflected in the submitted table, as summarised below. The LPA questions the appropriateness of 1bed rented accommodation.

	<b>Rent</b>	<b>Shared ownership</b>
<b>1 bed</b>	6	2
<b>2 bed</b>	20	7
<b>3 bed</b>	6	
<b>4 bed</b>	2	
	<b>34</b>	<b>9</b>

The affordable housing mix must reflect the need for larger rented family units. Any submission should be accompanied with evidence of discussions between the RP and the Council's Housing Development Team ([Paul.Bradbury@richmond.gov.uk](mailto:Paul.Bradbury@richmond.gov.uk) and [Ian.Ruegg@richmondandwandsworth.gov.uk](mailto:Ian.Ruegg@richmondandwandsworth.gov.uk)) to ensure the mix reflects the local needs.

Further details of rents, nominations etc are required. The Council's Tenancy Strategy includes guidance on affordable rents, and the Intermediate Housing Policy Statement sets out guidance on intermediate housing, at [www.richmond.gov.uk/services/housing/housing\\_strategy\\_and\\_policy/housing\\_strategies](http://www.richmond.gov.uk/services/housing/housing_strategy_and_policy/housing_strategies) [www.richmond.gov.uk/services/housing/housing\\_strategy\\_and\\_policy/housing\\_policies](http://www.richmond.gov.uk/services/housing/housing_strategy_and_policy/housing_policies)

### **3. Housing Mix, Tenure and Standards**

*Policy LP35 sets out the necessary housing mix and residential standard requirements:*

- 1. Development should generally provide family sized accommodation, except within the five main centres and Areas of Mixed Use where a higher proportion of small units would be appropriate.*
- 2. All new housing development are required to comply with the Nationally Described Space Standards (also refer to SPD Residential Development Standards, which sets out minimum standards).*
- 3. New housing development, should provide adequate external space – 5m<sup>2</sup> per flat plus an additional 1 sqm per additional occupant. Amenity space should be private, usable, functional and safe; easily accessible from living areas; and orientated to take account of need for sunlight and shading.*
- 4. 90% of all new build housing is required to meet Building Regulation Requirement M4 (2) 'accessible and adaptable dwellings' and 10% of all new build housing is required to meet Building Regulation Requirement M4 (3) 'wheelchair user dwellings'. Both M4(2) and M4(3) require step free access but are considered appropriate for upper floors served by a lift.*

*The Local Plan defines family housing as "having three or more bedrooms, however if of a suitable size (meeting the Nationally Described Space Standard and the external amenity standards) a two-bedroom property can be designed for 3 or 4 persons and would be considered as family housing". Most of the units are deemed 'family' accommodation, with over 50% being 2bed 3person and above, in line with the policy. (Notwithstanding such, it will be necessary to demonstrate the mix between the rent and intermediate housing is appropriate).*

The submission confirms the units will meet the Nationally Described Space Standards, which is welcomed. However, it appears several units are in excess of these standards. It is

recommended the units fall within the required space standards, to ensure efficiency of the site and affordability.

The scheme provides more than the required amenity space (providing 1230m<sup>2</sup>), however, there are concerns over the acceptability of some of the communal areas. This includes:

- The eastern community gardens being cut off from the flats, and separated by a road, raising safety, visibility and access concerns;
- The narrow nature of the west communal gardens – and the level of light reaching these areas.

The submission is inconsistent in terms of the number of flats that will meet the 10% wheelchair accessible units (M4) Cat3 – one document refers to 4 units, and the other five. Clarification is sought - however, this must be 10%. The paper also confirms 90% will meet M4(2), which is welcomed.

The rear elevation of the houses are within 20m of the central block, which contains habitable room windows in the north elevation. The South elevation of the central block is only 12.9m of the south block. This raises questions of the standard of accommodation. The scheme should achieve 20m between habitable room windows.

#### 4. Siting and design

*The NPPF advocates good design, recognising it is a key aspect of sustainable development, and permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area.*

*Policy LP 1 - Local Character and Design Quality – sets the Council's intention for all development to be of high architectural and urban design quality. The high quality character and heritage of the borough and its villages will need to be maintained and enhanced where opportunities arise. Development proposals will have to demonstrate a thorough understanding of the site and how it relates to its existing context, including character and appearance, and take opportunities to improve the quality and character of buildings, spaces and the local area.*

*To ensure development respects, contributes to and enhances the local environment and character, the following will be considered when assessing proposals:*

1. *compatibility with local character including the relationship to existing townscape, development patterns, views, local grain and frontages as well as scale, height, massing, density, landscaping, proportions, form, materials and detailing;*
2. *sustainable design and construction, including adaptability, subject to aesthetic considerations;*
3. *layout, siting and access, including making best use of land;*
4. *space between buildings, relationship of heights to widths and relationship to the public realm, heritage assets and natural features;*
5. *inclusive design, connectivity, permeability (as such gated developments will not be permitted), natural surveillance and orientation; and*
6. *suitability and compatibility of uses, taking account of any potential adverse impacts of the co-location of uses through the layout, design and management of the site*

*The above is reflected in LP 2 (Building Heights) and LP 39 (Infill, Backland and Backgarden Development), which require:*

1. *New buildings to respect the Boroughs townscape and local context*
2. *Retain plot widths and spacing between buildings*
3. *Enhance street frontage*
4. *Incorporate or reflect materials and detailing on existing dwellings*

The Village Plan guidance is that scale height and massing should relate to surrounding residential development, and that a contemporary design would be appropriate in relation to the Stanley Primary School.

There is no objection to the loss of the existing buildings, which do not contribute positively to the local area.

### Infill on Strathmore Road

#### Housing:

The two town houses are arranged as a simple two storey form with a top floor recessed to provide roof terraces in addition to the gardens. The main facades are to be in stock brickwork with the recessed upper floor will be clad in zinc or similar. Principal windows are arranged to be full height with opening lights to facilitate cleaning from the inside.

Whilst there is no objection to the principle of an infill housing development in this location, the design and form is unacceptable, whereby it appears bland, would represent an incongruous form of development and result in a poor juxtaposition with the adjacent building. Officers fail to identify how this responds to local residential context:

- The two / three storey flat roof form bears no resemblance to local character
- Eave heights are excessive
- Window design, form and scale do not respond to local context.
- Balconies / terraces appear as an alien feature in the street scene.

Neither is it considered that this is the optimum development for this location:

- There is a strong building line in this part of the road, and the proposed building 'gets lost' in between the two adjacent. Bringing the building forward and increasing the width of the footprint could be considered.
- Whilst a site visit has not been undertaken, it is understood that there are no flank wall windows on the building to the east. Given such, and the adjacent parking area, it could be possible to increase the depth of the building.
- It is recommended that the building has a compatible eave height with the adjacent building, with a pitched roof (modest dormer considers could be a consideration) Window and floor proportions should respond to adjacent properties.

#### Replacement nursery:

There are no objections to the form of the proposed nursery building. However, the following design recommendations are made:

- Consider some form of signage by the entrance, to provide interest and identity to the building.
- Further interest should be added to the front elevation – whether through fenestration, choice of materials, detailing or art work
- The purpose and need for the front boundary treatment is questioned, especially given the front building line almost abuts the footway. It would be more appropriate to omit such.

#### Central and rear block:

Whilst there are flats to the south of the site, the character of the area is predominately two storey residential properties, with pitched roofs. Officers recognise the need to make most efficient use of the site, and this may be through a flatted development, however, this must be achieved in a manner that does not harm the character of the area.

The scale and massing of the central block is deemed unacceptable. This is excessively long, bulky and the flat roof three storey nature shows no respect to local context. Further, insufficient effort has been made to reduce the massing of the building. It is recommended:

- The length of the block is broken up into two – (no longer than the length of a terrace within Strathmore Road).
- The massing of the building is reduced through materials (however officer suggest no more than 3), setbacks and vertical detailing.
- The height is reduced to mostly two storeys. Subject to the unneighbourly concerns being addressed, there could be a possibility of a second floor, however, this should be much

more modest, set in from elevations, and be punctuated on the building rather than the building being wholly a three-storey block.

- To ensure the elevations do not appear 'flat' there should be decent reveals to fenestration (no less than 150mm) and framing;
- The under crofts are not successful architectural features, result in 'dead frontages' at ground level and should be omitted

The rear block raises similar concerns to the central block. Elevations 1 drawing demonstrates the difference in scale between this building and that flats behind. Again, it is recommended this is a two-storey building. There may be a possibility of some second-floor accommodation, however, this must be modest in scale, and set in from the elevations and the most sensitive boundary. There are concerns regarding the elevational treatment - the under croft for the cycle storage and car parking is not deemed architecturally successful and should be revised. Further there is a lack of detail on the block, result in this appearing bland and uninspiring.

In summary, the scale, massing and design is not deemed acceptable, and does not meet the requirements of policy, and Village Plan guidance.

## **5. Open Space and Public Realm**

*Policy LP 31 (Public Open Space, Play Space, Sport and Recreation) sets out, where a development generates an estimated child occupancy of ten children or more, the scheme is required to make appropriate and adequate provision of dedicated on-site play space by following the London Plan benchmark standard of 10sqm per child and the guidance on the type of play and informal recreational spaces in developments as set out in the Mayor's 'Supplementary Planning Guidance on Shaping Neighbourhoods: Play and Informal Recreation'. The Council will also seek to integrate new major development within existing village areas and neighbourhoods. Therefore, new dedicated on-site play space should be made publicly accessible*

*In addition, the applicant should provide an assessment of the existing provision of play space within reasonable walking distance from the site Where the assessment of existing play facilities within the surrounding area demonstrates sufficient and high quality provision, on-site provision of play facilities may not be necessary, but this will be assessed on a case-by-case basis. Financial contributions may however be required to either fund new off-site provision, or improvements and enhancements of existing facilities, including access arrangements, to mitigate the impacts of new development.*

The scheme incorporates communal landscaped areas, however, does not indicate the quantum of play provision or the type of play space provided. This will be necessary in any future submission and should follow the Mayors SPD. Notwithstanding this, and as outlined in the previous section, there are concerns over the siting of the communal space on the east boundary given this is cut off from the residential flats by an access road, which may give rise to accessibility, safety and visibility concerns.

## **6. Sustainability**

*Policies LP 20 (Climate Change Adaption) and LP 22 (Sustainable Design and Construction) outline the necessary sustainability credentials of any forthcoming scheme. No details accompanied the application, and therefore the following must be reflected in any forthcoming scheme:*

1. The application must be accompanied with a completed Sustainable Construction Checklist.
2. The development will be required to incorporate water conservation measures to achieve maximum water consumption of 110 litres per person per day for homes (including an allowance of 5 litres or less per person per day for external water consumption).
3. The nursery is over 100m<sup>2</sup>, and therefore will be required to:

- a. Meet BREEAM 'Excellent' standard.
- b. Achieve a 35% reduction in CO2 emissions.
4. The residential element of the scheme must achieve zero carbon standards in line with London Plan policy.
5. The development will be required to connect to existing DE networks where feasible.
6. Applicants are required to consider the installation of low, or preferably ultra-low, NOx boilers to reduce the amount of NOx emitted in the borough.
7. Local opportunities to contribute towards decentralised energy supply from renewable and low-carbon technologies will be encouraged where appropriate.
8. Green roofs and/or brown roofs should be incorporated into new major developments with roof plate areas of 100sqm or more where technically feasible and subject to considerations of visual impact. The aim should be to use at least 70% of any potential roof plate area as a green / brown roof. The onus is on an applicant to provide evidence and justification if a green roof cannot be incorporated. The Council will expect a green wall to be incorporated, where appropriate, if it has been demonstrated that a green / brown roof is not feasible.

The above policies will therefore need to be complied with through any future applications and any shortfall must be fully and robustly justified.

## **7. Transport/parking/refuse & recycling issues**

*Policy LP 44 sets out the Council's aspiration to promote safe, sustainable and accessibly transport solutions, and policy LP45 outlines the parking requirement in new developments. Also, of relevance is the SA 7, which recognises that as a response to the sites poor access provision and location within a low PTAL area, onsite parking should be considered. A summary of key policy requirements are as follows:*

1. *High trip generating development should be located in areas with good public transport with sufficient capacity*
2. *Development should be designed to maximise permeability within and to the immediate vicinity of the development site*
3. *Development should not have a severe impact on the operation, safety or accessibility to the local or strategic highway networks.*
4. *Car parking:*
  - a. *New development should provide for car, cycle, 2 wheel and, where applicable, lorry parking and electric vehicle charging points, in accordance with the standards. Opportunities to minimise car parking through its shared use will be encouraged. Car free housing developments may be appropriate in locations with high public transport accessibility, such as areas with a PTAL of 5 or 6, subject to:*
    - *the provision of disabled parking;*
    - *appropriate servicing arrangements; and*
    - *demonstrating that proper controls can be put in place to ensure that the proposal will not contribute to on-street parking stress in the locality. All proposals for car free housing will need to be supported by the submission of a Travel Plan.*
  - b. *The London Plan recognises that areas with high levels of sustainability should aim for significantly less than 1 parking space per unit but sets out the following maximum parking standards:*
    - *1 - 2 bed – Up to 1 / unit*
    - *3 bed – Up to 1.5 / unit*
    - *4 bed – Up to 2 / unit*
  - c. *Adequate parking spaces for disabled people must be provided preferably on-site*
  - d. *20 per cent of all spaces must be for electric vehicles with an additional 20 per cent passive provision for electric vehicles in the future. The London Plan does not include parking standards for D1 uses but advises that the level of parking should be determined by the transport assessment undertaken for the proposal.*
5. *Cycle Parking*
  - *Residential - 1 space per 1 bedroom unit; 2 spaces per all other dwelling*

- *Safe, enclosed and weatherproof cycle parking must be provided (Sheffield' bike stands would be preferable).*

### **Transport Assessment and Travel Plan**

Given the nature and scale of the development, a full transport assessment and travel with plan will be necessary. Please refer to the links below for details on what is required in these two documents: <https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/transport-assessment-inputs/transport-assessment-structure>

As part of this document, the applicant must conduct a trip generation analysis using TRICS, the nationally recognised trip generation database, which can be accessed at: <http://www.trics.org/Login.aspx>.

The applicant must also complete a trip generation analysis using travel to work data from the Census of 2011, which can be accessed at: <http://commute.datashine.org.uk/>,

### **Road and access**

There is a dispute regarding the status of the road that currently runs through the site. It has been implied within the submission that this is a private driveway. However, for the following reasons it is the LPAs opinion this is a publicly adopted highway:

- The road is indicated on the Councils geographical mapping system that it is a highway maintained at public expense.
- The road contains a number of lighting columns, which are listed as Council street lights (401, 402, 403, 405 and 406)
- Strathmore Road is listed within the Highways Land Search Registers. (The Youth Club at the rear of the site is 65A Strathmore Road)  
[https://www.richmond.gov.uk/services/roads\\_and\\_transport/roads\\_and\\_road\\_works/highway\\_land\\_searches/highways\\_land\\_search\\_register](https://www.richmond.gov.uk/services/roads_and_transport/roads_and_road_works/highway_land_searches/highways_land_search_register)

If it was found this road is a publicly adopted highway, it would be necessary to apply for a Stopping Up order under s247 of the Town and Country Planning Act 1990. This is a statutory process, is subject to extensive consultation, and the outcome is not guaranteed.

It is also evident the road into the site is well used for on-street parking. Any proposal for the removal of this such, will displace existing parking elsewhere in an area already suffering from on-street parking congestion. This will need to be addressed in any submission.

### **Vehicle access:**

The scheme proposes to use an existing bell-mouth priority access junction from the southern side of Strathmore Road, a one-way street in a westerly direction for motor-vehicles with footways on its north and south sides of 2m in width. The access road, which leads into the development in a southerly direction, has a carriageway width of 5m and a footway of 2m in width on its eastern side.

From Drawing No. 1003/OD01 it appears that the scheme intends to remove the existing footway and replace it with a narrower footway on the western side of the access road. As outlined above, this would involve entering into a legal agreement with the Local Highway Authority under s278 of the Highways Act 1980. Current highway design guidance produced by the London Borough of Richmond states that, for a development with 43 dwellings, an access road should have a carriageway width of 5.5m, a continuous footway width of 2m, and a service strip/maintenance margin of 0.5m in width.

### **Pedestrian environment:**

- There is concern regarding the pedestrian environment. The layout shows there is no direct or continuous payment throughout the development to each of the entrances of the residential block or indeed the rear of the nursery.

- Any application needs to provide a footway with a minimum width of 2m to meet current Local Highway Authority design standards.

### **Car parking:**

A Technical Note has been provided, which in summary advises:

1. The scheme will provide 48 spaces on site – 46 associated to the residential use and 2 for the nursery.
  - a. The residential development generates the need for a maximum of 51 on-site parking spaces
  - b. The nursery generates the need for 2 on site spaces (for 4 members of staff)
2. Two on-street drop off bays will be provided on Strathmore Road, outside the nursery building.
3. Car parking surveys were carried out by the Council in April 2018 as part of a CPZ consultation, which indicates there is free capacity in Strathmore Road, particularly during evenings and overnight, to accommodate any peak parking demands, and therefore will not result in unacceptable adverse impact.
4. A total of 79 cycle spaces will be provided for the residential element (78 long stay and 1 short stay)
5. One cycle space will be provided for the nursery.

For clarity, the scheme is only required to provide a maximum of 43 spaces associated to the residential units and 2 spaces for the nursery. The scheme provides beyond this, and therefore, the residential on-site parking should be reduced. In addition, the following will be required in any submission:

- Turning circles to be illustrated
- Each space to be 4.8m by 2.4m
- 6m gap between opposite parking bays to ensure manoeuvrability.

The scheme proposes a dropping off area on Strathmore Road outside the nursery, on the existing disused drop kerb. This is not deemed acceptable. Firstly, it will result in the pavement being 'cut off' either side of the nursery, resulting in pedestrians walking into the road, which is a particularly safety concern especially given the school is sited opposite. Secondly, it will result in the loss of two existing on street parking bays, again, potentially causing parking congestion elsewhere. An alternative will need to be considered, and demonstrated this will not lead to parking congestion elsewhere.

If the Council did deem it acceptable in the future for the installation of two on-street vehicular parking bays on Strathmore Road, the applicant would also need to enter into a legal agreement under s278 of the Highways Act 1980.

The site plan indicates 10 parking bays for disabled people. However there are objections to the locations of such, which appear to be sited away from flat entrances, and dedicated footways.

The applicants are also advised 20% of all spaces must be for electric vehicles with an additional 20 per cent passive provision for electric vehicles in the future. It would be encouraged that beyond the 20% active provision, all other bays incorporate passive provision, as this will be cheaper than future retrofitting, and encourage air quality improvements.

### **Parking survey:**

The submission accompanied an extract from a parking beat survey on Tuesday 24 and Saturday 28 April 2018 which was used by the Local Highway Authority when consulting on a Controlled Parking Zone earlier this year. The two days of this survey show there would be enough space on Strathmore Road to accommodate five additional vehicles at most but not all times of the day and night.

This survey data is not deemed satisfactory for this application. The Council has an approved on-street parking survey methodology. This would include two surveys, on two separate weekday nights (Monday-Thursday), recorded between 12.30am and 5.30am, within a dedicated area, and which includes a beat map of the area surveyed at those times. It is recommended the highway consultant contacts the planning officer regarding the detail of such.

If the scheme was progressed in its current form, and 'if' the stopping up was deemed acceptable, it will need to be demonstrated that the existing on-street parking on site can be displaced elsewhere without causing unacceptable parking congestion, in line with the agreed parking survey methodology.

### **Future CPZ**

There has been consultation on the possible introduction of a Controlled Parking Zone in this area and that, in the event of one being implemented, the applicant may be required to enter into a legal agreement with the Local Highway Authority which would mean that residents would not be eligible for residents parking permits.

### **Cycle Parking**

- Storage for bicycles are proposed, with each of the houses having the ability for 2 bicycles in each garden; cycle stores are proposed with a joint capacity of 64No bicycles to serve the flats, (totalling 76No bicycles). The Scamps Centre will contain capacity for securing a minimum of one bicycle within a secured area.
- The cycle parking spaces meet standards set in the Local Plan. However, cycling to and from this development should be made as attractive as possible to meet the objectives within the Local Plan and Local Transport Implementation Plan, and to help reduce the number of short journeys made by car in the borough in the AM and PM weekday peak hours. Therefore, cycle parking areas must be secure and sheltered.
- There are concerns regarding the layout of some of the cycle storage facilities, particularly at the front of the central block and the facility associated to the south block. The facilities appear to be accessed between two parking bays (and not directly from the flat entrances). Revising the layout to ensure direct and safe pedestrian access to and from the stores are recommended.

### **Servicing Management Plan**

No details of servicing have been provided. Any application must be accompanied with a servicing management plan. This needs to show that:

- A refuse vehicle of not less than 10.4m in length can enter, turn in, and exit the development safely in forward gear,
- The refuse vehicle can get within 10m of any communal refuse collection point without having to reverse more than 12m. Turning areas for refuse vehicles should have a minimum distance of 18m between kerbs and 19m between walls.

### **Construction Traffic Management Plan**

The development, if permitted, will require extensive construction works. Any forthcoming application must be accompanied with a construction traffic management plan which must set out:

- The phasing of construction of the development
- What vehicles will be used to deliver construction materials to the site and to dispose of materials resulting from any demolition works
- How many vehicular trips the construction of the site will generate per working day
- The route construction vehicles will take to get to and from the site
- Details of any pre-commencement highway condition surveys that need to be carried out
- Details of any traffic management and/or highway licences the applicant might require during the construction and/or demolition process
- Confirmation that deliveries will not coincide with the AM and PM weekday peak hour traffic and home-school traffic.



## Pollution

*Any development will need to comply with policy LP 10 (Local Environmental Impacts, Pollution and Land Contamination) and the recently adopted SPD 'Development Control for Noise Generating and Noise Sensitive Development'*

Pertinent points include:

- Air Quality:
  - The Councils Air Quality officer has reviewed the submission and does not have any in principal objections. However, it is advised that from an air quality perspective this development is sited within an AQMA, off Stanley Road, a main road that has exceeded NO<sub>2</sub> EU limit values of 40 ug/m<sup>3</sup> for most of the last 15 years. In addition, it is opposite Stanley Primary School and the application includes a nursery school, with vulnerable receptors so emissions both during construction and once built will be of concern. Notwithstanding such, it is deemed this can be mitigated by condition. It is advised it would be better if the new nursery school could be sited as far back from Strathmore Road as is practical as it is recommended to site all schools and particularly nursery schools 150m back from the main road, however, if this is not possible, re-siting nursery school further back from main road, or as a minimum screening with a 2m high solid brick/wood fence or preferably dense green screen to Strathmore Road
  - Developers should secure at least 'Emissions Neutral' development. An Air Quality Assessment considering emissions both during the construction phase and once occupied for existing and future occupants is required including recommendations and remedial measures and actions to minimise the impact on the surrounding locality. Such mitigation measures may include:
    - EV charging points throughout as required by the London Plan. (In addition to the necessary active provision, it is encouraged to provide 100% passive EV charge points as recommended in LBRuT's new AQ SPD, however, it is acknowledged this is yet to be adopted)
    - Car club
    - Highly efficient insulation along with the installation of ultra-low NO<sub>x</sub> boilers with NO<sub>x</sub> emissions of less than 0.04 g/KWH of heat supplied. CHP to be discouraged.
    - A robust Travel Plan to encourage walking/cycling/public transport for the nursery school and staff.
    - A Delivery and Servicing Plan for the nursery
    - Cycle parking, including additional visitor/shopper cycle parking, in accordance with London Plan standards.
- Noise and Vibration: Good acoustic design will need to be demonstrated to ensure occupiers of new and existing noise sensitive buildings are protected.
  - The Councils Principle Environmental Health Officer raises no objection in principle, subject to the acoustic design following the requirements and guidance in the following recently adopted SPD ([https://www.richmond.gov.uk/media/16280/development\\_control\\_noise\\_generation\\_noise\\_sensitive\\_development\\_spd\\_adopted\\_september\\_2018.pdf](https://www.richmond.gov.uk/media/16280/development_control_noise_generation_noise_sensitive_development_spd_adopted_september_2018.pdf))
- Odours and Fume Control: The Council will seek to ensure that any potential impacts relating to odour and fumes from commercial activities are adequately mitigated.
  - Any extraction necessary for the nursery should be detailed in an application.
- Land Contamination: The Council promotes, where necessary, the remediation of contaminated land where development comes forward. Potential contamination risks will need to be properly considered and adequately mitigated before development proceeds.
- Construction and demolition: The Council will seek to manage and limit environmental disturbances during construction and demolition as well as during excavations and

construction of basements and subterranean developments. To deliver this the Council requires the submission of Construction Management Statements (CMS). Where applicable and considered necessary, the Council may seek a bespoke charge specific to the proposal to cover the cost of monitoring the CMS;

- Light pollution: Details of any external lighting should be provided, which is recommended to be kept to the minimum number of columns and height to minimise any potential impact. Further, any lighting should avoid upward light spill.

## **8. Flood Risk**

*Policy LP 21 aims to guide development to areas of lower flood risk; and policies LP 17 and LP21 require the use of Sustainable Drainage Systems and encourages measures to reduce surface water runoff, whether this is achieved through green roofs and green walls.*

1. This proposal would be classified as a major development, however, given the site is within Flood Zone 1, the 'Sequential Test' and 'Exception test' will not be required.
2. A Drainage Statement would be necessary. It will be necessary to demonstrate that the proposal achieves greenfield run-off rates, and where this is not feasible, this will need to be demonstrated, and in such instances, the minimum requirement is to achieve at least a 50% attenuation of the site's surface water runoff at peak times based on the levels existing prior to the development.

## **9. Amenity**

*All development will be required to protect the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties. Policy (LP 8), supporting text and SPDs set out parameters, which include:*

- *The design and layout of buildings should enable good standards of daylight and sunlight to be achieved in new development and in existing properties affected by new development;*
- *ensure there is a minimum distance of 20 metres between main facing windows and 13.5m between windows and buildings containing no habitable windows.*
- *Ensure balconies does not raise unacceptable overlooking or noise or disturbance*
- *ensure that proposals are not visually intrusive or have an overbearing impact as a result of their height, massing or siting, including through creating a sense of enclosure;*
- *ensure there is no harm to the reasonable enjoyment of the use of buildings, gardens and other spaces due to increases in traffic, servicing, parking, noise, light, disturbance, air pollution, odours or vibration or local micro-climatic effects.*

Residential properties adjoining the east, south and east boundaries of the site. The following comments are given without prejudice given a site visit has not been undertaken, nor has a sunlight /daylight report been submitted (which will be required with any submission):

### Nursery building:

- By reason of its single storey nature, positioning in the centre of the site, fronting Strathmore Road; distance to surrounding residential properties; this relationship is deemed acceptable. It is however recommended that details of hours; playtime management etc are provided to ensure the scheme does not generate unreasonable noise and disturbance.

### Central Block

- The building is sited approx. 22m off the eastern boundary; and approx. 33m to the main rear elevation of proposed backing onto the east boundary of the site. Whilst the scheme no doubt alters the rear outlook of these properties, given the separating distances this is not deemed to result in an unacceptable relationship.

- There are more pressing concerns over the relationship between this block and the properties that back onto the west boundary. Whilst the separating distances are more than 20m from potential first floor window to window, the building comes within approx. 5m of the boundary. Given the height, length and scale of the building and level of habitable windows and balconies on the west façade, this is deemed to represent an unneighbourly form of development, which will appear both visually obtrusive and cause an unacceptable level of overlooking in the adjacent rear gardens, to the detriment of these resident's amenities.

#### South block

- The building appears to be more than 20m from the main rear building line of the properties to the west and east, however within 1-5m of the boundary, with balconies. Similar to the above, there are objections over such close proximity and the visual impact and overlooking to these residential gardens.
- The south elevation is within 10-18m of No. 1-8 Birdwood Close. Again, this raises unneighbourly concerns, in terms of visual impact and loss of privacy, especially given balconies are proposed.

#### Road and parking:

- The proposed road is sited in the centre of the site, and parking adjacent to this. Officers recognise the benefit of removing the potential disturbance from general comings and goings away from residential properties. However, officers do question the value of the communal landscapes area, which appears cut off to the flats, and surrounding by cars, which limits its value. By reason of the existing relationship (road and parking area adjacent to east boundary), the applicants may wish to consider reciting the parking / road and amenity space over.

#### Summary:

In summary, there are objections to the relationship of the central and southern blocks with the adjacent residential properties, which cannot be supported. Whilst the purpose of the pre-application process is to respond to a proposed scheme, rather than advise of how the scheme should be designed, at the meeting a number of options were considered to lessen some of the above impacts. These included:

- Swap the location of the road and communal landscape area and move the central building eastwards to ensure an improved relationship with the properties to the west (whilst ensuring the above policy standards are still met)
- Design / orientation of the windows
- Obscure glaze habitable room windows.

## **10. Trees**

*Policy LP 16 - Trees, Woodlands and Landscape, requires the protection of existing trees and the provision of new trees, shrubs and other vegetation of landscape significance that complement existing, or create new, high quality green areas, which deliver amenity and biodiversity benefits. In particular:*

- 1. resist the loss of trees, unless the tree is dead, dying or dangerous; or the tree is causing significant damage to adjacent structures; or the tree has little or no amenity value; or felling is for reasons of good arboricultural practice; resist development that would result in the loss or deterioration of irreplaceable habitat such as ancient woodland;*
- 2. resist development which results in the damage or loss of trees that are considered to be of townscape or amenity value;*
- 3. require, where practicable, an appropriate replacement for any tree that is felled; a financial contribution to the provision for an off-site tree in line with the monetary value of the existing tree to be felled will be required in line with the 'Capital Asset Value for Amenity Trees' (CAVAT);*
- 4. require that trees are adequately protected throughout the course of development, in accordance with British Standard 5837 (Trees in relation to design, demolition and construction – Recommendations).*

5. *The Council will require that site design or layout ensures a harmonious relationship between trees and their surroundings and will resist development which will be likely to result in pressure to significantly prune or remove trees;*
6. *require new trees to be of a suitable species for the location in terms of height and root spread, taking account of space required for trees to mature; the use of native species is encouraged where appropriate;*

The pre-application has been accompanied with A Preliminary Arboricultural Report, which advises the trees have been inspected from ground level and recorded in line with BS 'Trees in relation to design, demolition and construction – recommendations'. The survey indicate there are 31 trees on site (13 'B' category and 18 'C' category).

The survey and proposed layout has been reviewed by the Council's Arboricultural Officers. Whilst it is acknowledged the trees on this site are not protected by a tree preservation order (TPO) or conservation area, there are fundamental objections with the proposed loss of trees, especially given the site is within an area proposed for additional tree planting.

To achieve the proposal, a significant number of trees will be lost from the site. Many of the internal trees are Leyland cypress and the LPA are not concerned about their removal. However, the scheme results in the loss of all category C trees (18 in total) and 5 category B trees. In addition, the proposal would result in an overall loss of soft ground from the site and therefore limiting any mitigation planting.

It is of the Council's opinion a number of the B category trees are worthy of a TPO, including:

- T30, T31 and T32 (a group of Norway maples)
- T23, T24 and T25 (group of birch) both groups highly visible from Strathmore road.
- T21 (Beech)
- T18 (Red Oak)
- T6 (Oak) mature specimens on the west and south boundary.

On the basis of the above, this scheme would not be supported by the Tree and Woodland policy LP16 in its current form, and the scheme should be revised to retain the following on site:

- T30, T31, and T32 visible from Strathmore Road
- T23, T24, T25 visible from Strathmore Road
- T6, T5, T3 (Oak, Beech, Hornbeam) in the south east corner of the site visible from Birdwood Close
- G7 (group of Hornbeams) on the southern boundary line, providing a screen between Birdwood Close and the play centre

In addition, it would be desirable would be T21 and T18 (Beech and Red Oak) on the western boundary

Clearly the above advise poses a fundamental issue for the redevelopment of this site. Whist the scheme clearly provides affordable housing benefits, based on the information provided, officers fail to see how the scheme can be supported in response to the extent of tree loss. These are deemed valuable to the local area, and the impact of their loss will be acerbated given the site is within an area in need for tree planting. By reason of the limited and narrow nature of the remaining open spaces, mitigation planting to compensate their loss is deemed insufficient.

## **11. Ecology**

*LP 15 seeks to preserve and where possible enhance the Borough's biodiversity and specifically requires new development to:*

- *Support enhancements to biodiversity*

- *incorporate and create new habitats or biodiversity features, including trees, into development sites and into the design of buildings themselves where appropriate;*
- *deliver net gain for biodiversity, through incorporation of ecological enhancements, wherever possible;*
- *ensure new biodiversity features or habitats connect to the wider ecological and green infrastructure networks and complement surrounding habitats;*
- *enhance wildlife corridors for the movement of species, including river corridors, where opportunities arise; and*
- *maximise the provision of soft landscaping, including trees, shrubs and other vegetation that support the borough-wide Biodiversity Action Plan.*

Insufficient information has been submitted to enable the LPA to provide meaningful advice on ecology matters. However, there are concerns with the extent of development, the loss of tree cover; it is advised:

- A PEA will be required to accompany the full application (carried out at the right time of year)
- Tree planting
- No net loss of green landscaping, including existing green and tree corridor.
- Concern over increased shading over the surrounding gardens
- Need for ecological enhancements including a 2m width native hedge planted around the perimeter of the site within the soft landscaping and new habitat for invertebrates, stag beetles, bats, hedgehogs and birds.
- No external lighting and a 5m dark corridor along the boundary. The flat roof should accommodate a mixed green/brown roof as per policy LP17

## **12. Other matters:**

### **a. Education**

- Policies LP 28 and LP 29 seek to safeguard land and buildings in education use; work with land owners to secure sites for schools; and ensure there is sufficient capacity within the existing infrastructure to accommodate the needs arising from new development.
- The School Place Planning Team at AfC have no objections from a school place planning perspective, whereby there is currently spare capacity in local schools both at primary and secondary phases, which could readily absorb the 'pupil yield' from the development in both the short and longer term.
- At the time of writing this response, the LPA has not received a response from the Early Years Team regarding the Scamps re-provision.

### **b. Sub-station:**

There is an electricity sub-station located in the southeast corner of the site. This is shown to be relocated on the east boundary to the rear of 39-41 Strathmore Road. Agreement regarding the re-provision, phasing, and design of such will need to be agreed with the provider and the LPA.

## **13. Community Infrastructure Levy**

The Community Infrastructure Levy (CIL) is a charge that the Council sets for certain new developments in the Borough. The Borough CIL Charging Schedule came into effect from 1 November 2014. The Mayor of London has also introduced CIL charges which would be required for this development.

Further information on the Borough and Mayoral CIL can be found here: [http://www.richmond.gov.uk/community\\_infrastructure\\_levy](http://www.richmond.gov.uk/community_infrastructure_levy)

#### **14. Procedural matters**

- The applicant is strongly advised to undertake thorough and meaningful publicity and community engagement with the local community prior to the submission of a planning application.
- Given the scale of the scheme, it is recommended that a Planning Performance Agreement is entered into with the Council.

#### **15. Validation Checklist**

The Council has published a Local Validation Checklist (April 2015) as amended. Whilst not exhaustive, it is officers initial view that the following will be required in any submission:

- Application fee
- Application form
- Ownership and Agricultural Holdings certificates
- Plans / Elevations (including streetscene)
- Community Infrastructure Levy form
- Site location plan
- Existing and Proposed Plans
- Photomontages / CGIs (recommended)
- Planning Statement, including Community Engagement Report, Residential Standards Statement, Inclusive Access Statement and Wheelchair Statement
- Marketing Report (subject to loss of social infrastructure)
- Affordable Housing Statement
- Affordable housing design quality checklist
- Viability Statement to make reference to affordable housing and zero carbon standards
- Design & Access Statement
- Transport Assessment, Parking Layouts and Tracking
- Full Travel Plan in line with TfL guidance
- Parking Survey
- Delivery and Servicing Plan
- Framework Construction Management Statement
- Construction Logistics Plan
- Energy Report
- Sustainable Construction Checklist
- Sustainable Drainage Statement
- Decentralised Energy Assessment
- Landscape Scheme
- Tree Survey, Arboricultural Impact Assessment
- Preliminary Ecological Appraisal
- Health Impact Assessment
- Daylight/Sunlight Assessment
- Surface Water Drainage Strategy
- Foul Water Drainage and Utilities Assessment
- Land Contamination Assessment
- Draft HoTs
- Acoustic Assessment
- Air Quality Assessment
- Daylight and lighting pollution assessment
- Building Regulations Statement

**Without prejudice**

In summary, whilst officers recognise the benefits deriving from the scheme, primarily the nursery re-provision and 100% affordable housing, which are both welcomed, based on the current scheme and evidence provided, the development cannot be supported on the following grounds:

- Design and scale of the proposed buildings
- Quality and suitability of the communal gardens and lack of play space
- Loss of the existing road network and on-street parking
- Pedestrian environment
- Adequacy of the parking survey
- Relationship of physical development with neighbouring residential properties, primarily those to the west and south (and east in connection to the southern block)
- Loss of trees worthy of a TPO

Any given advice by Council Officers from pre-application enquiries does not constitute a formal response or decision of the Council with regard to future planning consents. Any views or opinions expressed are given in good faith and to the best of ability without prejudice to formal consideration of any planning application, which was subject to public consultation and ultimately decided by the Council. You should therefore be aware that officers cannot give guarantees about the final form or decision that will be made on your planning or related applications.

Although the advice note will be brought to the attention of the Planning Committee or an officer acting under delegated powers, it cannot be guaranteed that it will be followed in the determination of future related planning applications and in any event circumstance may change or come to light that could alter the position. It should be noted that if there has been a material change in circumstances or new information has come to light after the date of the advice being issued then less weight may be given to the content of the Council's pre-application advice of schemes. You are also advised to refer to local and national validation checklist on the Council's website.

In the meanwhile, should you have any further concerns or enquiries please do not hesitate in contacting me.

Yours sincerely

**Lucy Thatcher**  
**Strategic Applications Manager (Richmond)**

**Former Teddington Youth Centre & the Strathmore Centre, Strathmore Road,  
Teddington, TW11 8UH**

**Pre-application advice submission:**

Demolition of existing buildings, and redevelopment to provide 33 affordable housing units, re-provision of Scamps nursery accommodation; onsite parking and alternations to access.

**Officer:** Lucy Thatcher

**Meeting date:** Wednesday 13 March

**Introduction**

This note forms a follow up to the original pre-application scheme submitted in 2018 (and meeting held in October 2018). Please refer to the original response for policy context, with this response only commenting on the revisions. On matters not amended, the applicants are advised to refer to the original response.

**Proposal:**

The proposed development comprises a mixed nursery and residential redevelopment comprising:

- Demolition of existing buildings
- 33 residential units contained within two buildings:
- 37 on-site parking spaces
  - a. 4 allocated to Scamps
  - b. 33 allocated to residential
- 1120m2 communal landscaping
- Scamps Nursery (to replace the existing use) with external play space,

**Land use:** The following points remain pertinent:

1. Nursery: Recommend any submission is accompanied with the statement from Scamps confirming:
  - The existing accommodation does not meet their needs
  - The proposed internal and external space will fulfil their requirements and be fit for purpose.
2. Marketing: Officers recommend:
  - Any submission is provided with weblinks for a period of not less than 2 years demonstrating the site has been on the public disposal list
  - Confirmation is provided demonstrating that a public disposal process has taken place as part of an agreed programme of social infrastructure re-provision which confirms the disposal of assets is necessary to ensure delivery of social infrastructure and related services.
  - Confirmation that discussions with partners has taken place.



### Suitability for mix of affordable housing

Unit Size	Affordable Rent	Shared Ownership	Total
1b2p	5	1	6
2b3p	7	3	10
2b4p	10	1	11
3b5p	4	2	6
<b>Total</b>	26	7	33

1. The tenure mix meets Housing and planning policy requirements.
2. There are objections to the provision of 3bed 5-person shared ownership units, as these would not meet the LB Richmond's affordability criteria. It is recommended these two units are switched to affordable rent. To address the tenure balance, two of the 2bed 3-person units can be switched to shared ownership. Alternatively, the floor space occupied by two 3 bed homes could be replaced with three 1 bed homes.

### Design and scale of buildings

Previously officers raised objections to the siting, scale and design of the scheme, in particular:

- Block A, the infill on Strathmore Road: Failing to respond to local context; unacceptable design and form; bland and incongruous form of development; poor juxtaposition with adjacent street scene; excessive eave height; flat roof form inclusion on balconies / terraces.
- Central block: Scale and massing unacceptable; insufficient effort to reduce massing; lack of depth / interest on elevations; dead frontages.
- Rear blocks: Scales; height; elevation treatment bland and uninspiring.
- Nursery: Need for identify / interest at entrance and front elevation

Officers have the following comments on the revised scheme:

1. The scheme relocates the nurse building to the rear of the site. No objections are raised to such, however, the comments previously provided on elevation treatment and detail still apply.
2. Block A: As previously outlined, there are no objections to an infill development, however, the revised scheme does not overcome previous concerns, in fact raising new objections, summarised below:

Front elevation:

- Gable roofs: Incongruous in vicinity; and results in a harsh relationship with adjacent building and over scaled flank wall.
- Eave and ridge heights excessive, not responding to local context
- Lack of attention to detail: Dorner windows having a poor relationship with the fenestration below
- Horizontal emphasis: No effort to break up length of frontage through detailing, reveals, materials; roof parapets;

Side elevation:

- Scale, massing and height excessive, and fails to respond to local context.

- If a gable end had been found acceptable in principle, this would require elevational treatment amendments, including a clear eave line and different materials at flank / roof level, both of which would assist to break up massing.

Rear elevation:

- Confusion over the form of building – is this meant to appear as a block of flats or a terrace?
  - Three storeys at the rear is unacceptable. It is recommended this is two and accommodation in roof. The two end gables should be full pitched height (starting above the first floor) with the 2<sup>nd</sup> floor accommodation being within roof space.
  - Excessive number and size of windows. Consider the window hierarchy – larger at the bottom, then reducing in size as you go up in floors.
3. Block B: Improvements have been made through the removal of under-croft parking and breaking up the length of building with reveals and setbacks. However, objections remain to the finished design:
- Parapet wall overly high, resulting in elevations appearing top heavy. Reduce
  - Oversized / poorly designed / poorly sited dormers. The surrounds are too large, and these do not line up with fenestration below.
  - West and east elevations - a further reveal is required to break up the length of this building.
  - South and north elevations – awkward, with flat roofs, hipped roofs, dormers, etc. It is recommended the design is more honest to its form. If this is intended to be a flatted development, with essentially flat roof, it may be more successful to design such, however, with some mitigation / softening. For example, a two-storey building, with 'pods' at third floor set back from elevations.

Currently, the scheme does not meet the aims of the NPPF, namely good design and taking opportunities for improving the character and quality of an area. Furthermore, the development fails to demonstrate how it relates to existing consent, as sought by LP 1.

Whilst officers are not categorically requesting the proposed development reflects the elevations treatment / aesthetic design of the immediate context, and forms a pastiche development response, it is recommended further effort is needed to ensure the scheme is compatible with local grain, scale, proportions and height, perhaps with a more contemporary interpretation.

### **Open / amenity space, public realm and playspace**

1. Previously there were objections to the location on the communal gardens (separated by a road) and the lack of detail of the quantum and type of playspace provided.
2. The scheme has revised the location of the communal gardens, which is much improved and addressed previous objections.
3. Based on the current residential mix / tenure the following amenity / play space is required:
  - a. 281m<sup>2</sup> amenity space
  - b. 270m<sup>2</sup> of Playspace provision
    1. 55%: under 5s
    2. 29%: 5-11
    3. 16%: 12+

The scheme provides 1120m<sup>2</sup> communal gardens, which is clearly enough for the scale of the development.

4. Any submission needs to provide details on the location, size, and type of playspace provided.

#### **Quality of accommodation**

1. Internal standards: Where units exceed the Nationally Described Space Standards:
  - Provide justification
  - Demonstrate it does not compromise the affordability of the unit
  - Demonstrate it does not compromise the ability to make efficient use of the site.
2. Concern was previously expressed with the relationship of the proposed blocks and the consequential impact on the accommodation. This has improved; however, the following is recommended:
  - Where windows face onto a wall which contains habitable windows, and is less than 20m apart, consider:
    - Splaying windows to minimise overlooking?
    - Obscure glazing / fixed shutting non-habitable windows

#### **Transport / parking / refuse and recycling issues**

1. The original scheme raised the following concerns:
  - a. Dispute over status of the road
  - b. Access – width of the road and footway; and servicing / maintenance strip
  - c. Pedestrian environment – lack of direct or continuous pavement and width
  - d. Parking:
    - a. Over provision of parking for the proposed development
    - b. Loss of on-street parking and consequential impact in vicinity.
    - c. Location of the disabled parking bays
    - d. Parking survey methodology
  - e. Layout of the cycle parking storage
2. No new details have been provided for the following issues, and therefore comments remain as original feedback, namely the need for:
  - a. Full transport assessment and travel plan, with TRICS assessment
  - b. Servicing management plan, with manoeuvring details
  - c. Construction Management Plan
  - d. Turning circles – all vehicles
  - e. Confirmation all spaces are 4.8m by 2.4m
  - f. Reinstate the dropped curb on Strathmore Road
  - g. Electric charging points – passive and active.
  - h. CPZ contribution

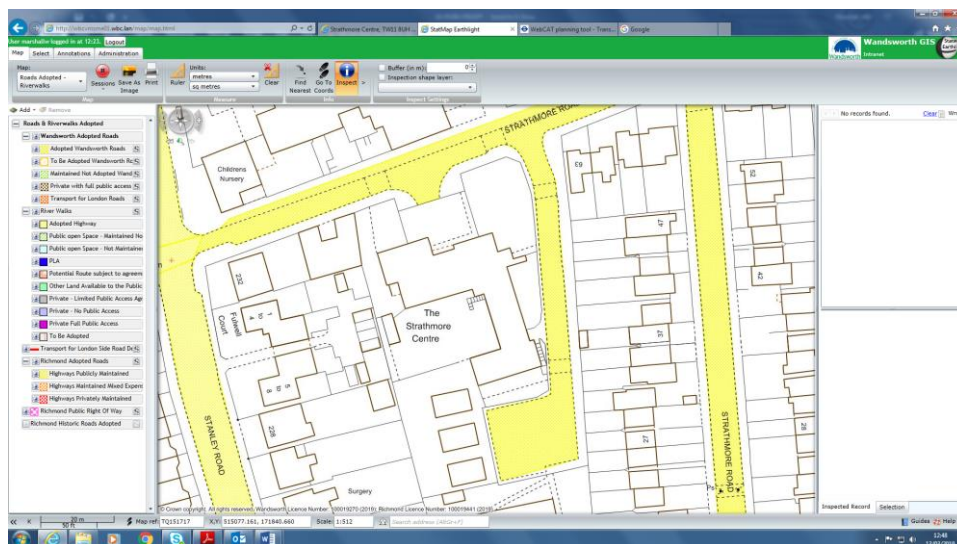
Updated comments on highway matters are as follows:

3. Stopping Up Order: The existing road appears to be approximately 5.8m in width. The proposed road width (to provide carriage way and existing on street parking) is only 5.43m in width, and therefore the proposed parking encroaching onto the existing highway.

The applicant will need to apply for an order under Section 247 of the Town and Country Planning Act 1990 to stop up the existing access road to widen the existing carriageway to create allocated on-street parking on its western side, and to maintain safe access to

the site for all road users in accordance with the NPPF, and to construct the allocated vehicular parking courts in the southern part of the site. Please see details of the existing highway boundary below. Please also note that this process is subject to public consultation and is not guaranteed.

Alternatively, a Stopping Up Order may be needed for the parking bays associated to the development to encroach onto the highway. As discussed in the next point, there are objections to the proposed width of the road, which will need to be addressed and then the Stopping Up Order can be discussed at further depth.



4. **Vehicular Access to the Site:** The newly widened private access road would serve a parking court with up to 37 vehicular parking spaces and would need to be used by refuse vehicles of not less than 10.4m in length so that they can service the properties that cannot be serviced from the roadside on Strathmore Road. Therefore, it would need to have a carriageway width of at least 8.8m to allow a car to pass an HGV safely and to allow for allocated parking bays on both sides of the carriageway. A turning area would also need to be provided for the refuse vehicle, and a tracking drawing provided which would need to show that the vehicle could enter, turn in, and exit the development safely in forward gear. This equally applies to emergency vehicles. The proposed width of the road (with parking both sides) is only 7.84m, thereby falling short of the requirement. This will need to be addressed.

Forward visibility along the access road would also need to meet standards set out in *Manual for Streets* (2007), which can be access at:

<https://www.gov.uk/government/publications/manual-for-streets>.

Access from the existing access road is one-way in a westerly direction and sideways visibility from the access meets standards set out in *Manual for Streets*.

5. **Pedestrian Access to the Site:** The scheme incorporates a footway link from Strathmore Road into the site. As outlined in previous advice all pavements need to be 2m in width, and this must be demonstrated on plans. The footway must be hard-surfaced and lit.
6. **Existing parking:** The scheme has been revised to retain the existing road access, which is favourable. To understand the implications of the development on on-street parking, any submission should be accompanied with existing and proposed on-street parking layouts – this will need to demonstrate that the ‘unrestricted parking spaces’ and the proposed residential parking spaces do not limit / compromise movement of vehicles

through the site, including servicing and emergency vehicles. It is understood the road into the site can cater for 28 parking spaces, although the letter says 20; and 14 spaces can be provided. Therefore, there is potential the loss of 14 on-street parking space.

7. Vehicle parking: The site is located within PTAL 2, and therefore based on the Local Plan maximum parking standards, the scheme could provide up to 33 spaces for the residential units and 2 spaces for Scamps (4 members of staff) – 35 in total. The scheme incorporates 37 vehicular parking spaces:
  - a. The over provision will need to be addressed – it is recommended the scheme retains more of the existing on street parking spaces. There is inconsistency in the submitted report and plans over the number of parking spaces for Scamps. Regardless to what this intended, it is recommended this does not exceed the maximum parking space standards.
  - b. The scheme results in the over provision of disabled parking bays. There are four wheelchair flats, therefore 4 spaces are required for the residential element and 1 space for Scamps.
  - c. The scheme may result in the loss of 14 existing on street parking.
  - d. Parking surveys have been undertaken, that demonstrate parking street is 79-81%, with at worse, 25 spaces being available. If this is correct, the scheme may not raise unacceptable parking congestion or prejudice the free flow of traffic and highway safety. The highways Officer needs to review all the plans and commentary of the survey work.

The scheme needs to clarify whether it intends to create allocated pick-up/drop-off bays on the eastern side of the access road and who these bays will be allocated to.

The carriageway could be narrowed if the number of bays were reduced on this side, as it would create passing places for motorists looking to get in and out of the development. If they intend to provide these spaces, the applicant needs to clarify how they will be managed so as not to be parked in by members of the public.

8. Cycle storage: Two cycle shelters are proposed for the residential use, indicating spaces for 40 cycles. Based on the London Plan standards 60 spaces are required (1 for each 1bed unit and 2 spaces for 2 and 3 bed units). Insufficient cycle spaces are thereby provided and needs addressing.

The nursery generates the need for 1 space per 8 staff and 1 space per 8 students. It is recommended that any scheme indicates the location and quantum of cycle / scooter parking. To encourage more sustainable travel, the nursery building should provide shower / changing facilities.

9. If you wish to discuss any of the above, please contact Will Marshall ([Will.Marshall@RichmondandWandsworth.gov.uk](mailto:Will.Marshall@RichmondandWandsworth.gov.uk)). However please copy myself into any correspondence so I am aware of any updated information. Also, when doing so, please note that Will will only be commenting on one matter, and the local planning authority needs to consider a number of material planning considerations and place weight accordingly, and therefore a different view may be formed.

### **Relationship with neighbouring properties**

1. Proposed nursery:
  - a. Still need details of hours; numbers of children; playtime management etc.
2. Previously, there was objections to the following relationships:

- central block only 5m off west boundary
  - southern block only 1-5m off boundary to east and west properties
  - south block within 10-18m of Birdwood Close
3. The amended relationship with the surrounding properties is much improved:
- a. Block A: This remains 22m off the east boundary; extends only 2.43m beyond the adjacent property (which is in commercial occupation); and 20m from the flats to the west. As such, this is not deemed to appear overbearing.
  - b. Block B: Given the separating distance from the east and west boundaries (13m and 8-25m respectively) and distance to rear facades to the east and west (23m and 31m); this relationship is deemed acceptable.
  - c. Notwithstanding the above, it is recommended non-habitable room windows (and secondary windows) are obscure glazed to reduce the perception of overlooking and to protect the privacy of future occupants.
  - d. Nursery Block: The nursery building has been re-sited to the rear of the site. Whilst this is only 4-17m off the south boundary, and within close proximity to the west boundary, by reason of this being single storey, this relationship is deemed satisfactory.

### **Trees**

1. The previous submission was accompanied with a Preliminary Arboricultural Study, which identified 31 trees on site (13 'B' category and 18 'C' category). Previous concerns focused on:
  - Loss of trees, especially as the site is within an area for additional tree planting
  - Loss of all category C trees (18) and 5 category B trees
  - Loss of soft ground, limiting mitigation planting
  - Scheme should be revised to retain:
    - T30, T31 and T32 visible from Strathmore Road
    - T23, T24 and T25 visible from Strathmore Road
    - T6, T5, T3 in southeast corner
    - G7 on southern boundary
  - No objections to loss of Leyland cypress
2. The revised scheme alters the original layout. This has been reviewed by the Arboricultural Officer who raises the following concerns / objections:
  - a. It is unclear if the submitted drawings are tree root protection areas or crown spread. This should be clarified in any future submission.
  - b. The proposal has implications for several individual and groups of trees across the site, and there appears to be an overall loss of trees, amenity and soft-ground provision.
  - c. Notwithstanding the previous advice, the scheme still proposes the loss of a group of Silver Birches (T23, T24, T25), visible from Strathmore Road. These trees are of reasonable amenity and are potentially worthy of TPO. Within this group of trees T26 and T27 would also be lost. Justification for removal of these trees if protected would need to be provided alongside mitigation planting or similar financial contribution.
  - d. The proposal would also see the likely loss of G29 with a pedestrian path close to the Norway maple grouping of T30 / T31 / T32. This path would be well inside the trees root protection area and close to tree trunks.

- Show the root protection areas and canopy spreads
  - Show the exiting / proposed line of the pavement in this location
  - Investigate if the path can be re-sited, and if not demonstrate why
  - Demonstrate how the proposed pavement (construction, compaction etc) will not harm the health of these trees.
- e. Scamps: Concern is expressed with the relationship between the trees and the proposed Scamps building, particularly, the lack of open areas without tree canopy and limited availability of sunlight for the centre users. Whilst the plans show the retention of T6 and G7, officers question the feasibility of such, with the play zone most probably resulting in the need for their loss or post development pressure to fell. As outlined previously, T6 and G7 are considered worthy of TPO, and therefore any plans need to remonstrate their retention and sustainable future with the proposed building, both through construction and relationship with the building and future users.
- f. The provision of trees within the parking area is commendable. However, this needs to be supported with provision of viable below ground rooting for trees. This is an expensive undertaking but is likely the only sustainable option to support trees in the mid to long term within a car park environment. Trees around disability bays is not recommended given reasonable clearance needed for users and the everyday nuisance caused by trees, this could be overcome. If a detailed scheme planting scheme with below ground rooting were submitted this could be considered as mitigation.

Overall whilst this submission is an improvement on previous, there remains concerns of the overdevelopment of the site with an adverse impact on trees/greenery and space provision. At this current time, the Council's Arboricultural Officer fails to see how the loss of trees cannot be reasonably mitigated against. The applicants are also advised, the LPA has been advised by the Arboricultural Officer that the applicability of serving a TPO is to be discussed with the Arboricultural Manager.

### **Ecology:**

1. Officers previously advised insufficient information had been provided for an informed view be taken on ecology matters. However, there were concerns with the extent of development, the loss of tree cover. It was advised:
  - a) A PEA would be required;
  - b) There should be no net loss of green landscaping
  - c) Additional tree planting is required.
  - d) Concern over shadowing the surrounding gardens
  - e) Need for ecological enhancements including a 2m width native hedge planted around the perimeter of the site within the soft landscaping and new habitat for invertebrates, stag beetles, bats, hedgehogs and birds.
  - f) No external lighting and a 5m dark corridor along the boundary. The flat roof should accommodate a mixed green/brown roof as per policy LP17
2. Limited additional information has been provided, and therefore comments are restricted to:
  - a. A Preliminary Ecology Appraisal is still required, along with bat roost / emergent surveys if required.
  - b. 70% of the roof should be 'green' or 'brown'. Any submission should specific the planting, specification, species and proposed maintenance.

- c. Demonstrate how the scheme delivers a net gain for biodiversity, through incorporation of ecological enhancements. For example:
  - plant a 2m native hedge / planting around the perimeter
  - incorporate bird / bat boxes
- d. External lighting – any scheme should indicate where existing lighting is proposed and include details of plans, locations, lamp specifications and horizontal lux contour map. These should be minimised and kept to low level bollards. With the relationship of pathways / cycle stores, there is an opportunity for the provision of a 5m wide dark corridor along the west boundary. This should be investigated.
- e. Shadowing: Indicate on a plan the shadowing lines of the garden – this will be needed as part of the sunlight / daylight test
- f. Take into consideration the Richmond Biodiversity Action Plan

#### **Other matters:**

1. Officers note the revisions do not provide additional information / amendments on the following planning considerations, and therefore the applicants are advised to refer to the original written response regarding
  - a. Sustainability
  - b. Air quality
  - c. Noise and Vibration
  - d. Light pollution
  - e. Odours and fume control
  - f. Land contamination
  - g. Construction and demolition
  - h. Flood Risk
  - i. Education
  - j. Sub-station

#### **Procedural matters**

1. The applicant is strongly advised to undertake a thorough and meaningful publicity and community engagement with the local community prior to the submission of a planning application.
2. Given the scale of the scheme, it is recommended that a Planning Performance Agreement is entered with the Council.
3. The applicants advised that the development will trigger the need for the scheme to be reviewed by the Richmond Design Review Panel. It is recommended the applicants / agent contact Daniela Lucchese - [DLucchese@wandsworth.gov.uk](mailto:DLucchese@wandsworth.gov.uk)

#### **Without prejudice**

In summary, whilst officers recognise the benefits deriving from the scheme, primarily the nursery re-provision and 100% affordable housing, and the revised scheme heading in the right direction in terms of layout, there remains several objections on the design and scale of the proposed buildings and on going concerns regarding the ecological and landscape implications.

It is understood that the scheme will be referred to the Richmond Design Review Panel, which is welcomed.



Any given advice by Council Officers from pre-application enquiries does not constitute a formal response or decision of the Council regarding future planning consents. Any views or opinions expressed are given in good faith and to the best of ability without prejudice to formal consideration of any planning application, which was subject to public consultation and ultimately decided by the Council. You should therefore be aware that officers cannot give guarantees about the final form or decision that will be made on your planning or related applications.

Although the advice note will be brought to the attention of the Planning Committee or an officer acting under delegated powers, it cannot be guaranteed that it will be followed in the determination of future related planning applications and in any event, circumstance may change or come to light that could alter the position. It should be noted that if there has been a material change in circumstances or new information has come to light after the date of the advice being issued then less weight may be given to the content of the Council's pre-application advice of schemes. You are also advised to refer to local and national validation checklist on the Council's website.

In the meanwhile, should you have any further concerns or enquiries please do not hesitate in contacting me.

Yours sincerely

**Lucy Thatcher**  
**Strategic Applications Manager (Richmond)**

## **APPENDIX FOUR**

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**Richmond  
Design Review Panel  
C/o Richmond Council**

Environment and Community Services  
Department  
Civic Centre  
44 York Street  
Twickenham TW1 3BZ

Please ask for/reply to:  
Telephone: 020 8891 1411  
Direct Line: 020 8871 7564

Email: [bsellers@wandsworth.gov.uk](mailto:bsellers@wandsworth.gov.uk)  
Web: [www.wandsworth.gov.uk](http://www.wandsworth.gov.uk)

Our ref: ECS/  
Your ref:  
Date: 05 August 2019

Robin Harper  
Harper Planning  
The Boathouse Design Studio  
27 Ferry Road,  
Teddington  
Middlesex  
TW11 9NN

Dear Robin

**Richmond Design Review Panel: Strathmore Centre, Teddington, TW11 8UH**

The Panel is grateful to you and your development team for participating in the Richmond Design Review Panel (RDRP) held on the 18 July 2019. The Panel was able to visit the site and thanks the team for the clear and comprehensive presentation of the proposals for the Strathmore Centre in Teddington. This letter will remain confidential until a formal planning application has been submitted, whereupon it will appear alongside the information provided.

The proposals involve the following:

- Demolition of all existing buildings; the erection of 2 no. part two-, part three-storey residential apartment blocks comprising 6 x one bedroom, 18 x two bedroom and 6 x three bedroom affordable units in total; erection of new nursery building; alterations to the existing access and parking arrangements to provide 32 no. allocated car parking spaces plus 14 no. on street car parking spaces; ancillary structures, landscaping and playspace provision.

The site, allocated to affordable housing and social infrastructure in the Local Plan, is located in a largely residential area of mixed and contemporary design elements near the Stanley Primary School along Strathmore Road, and in walking distance from Fulwell Station.

The site itself contains to the north, facing Strathmore Road, the disused Strathmore Centre with several standalone buildings, and further back to the south the Scamps Nursery, a one storey pavilion structure which provides a complete range of child-care services such as after school club for the nearby Stanley Primary School, as well as acting as a nursery to pre-school aged children.

**Summary**

The Panel is pleased to see the site coming forward especially as the development will regain an under-used area by providing 100% affordable housing and a new and improved nursery to replace the existing one. However, the Panel expressed strong concerns over the composition

of the site and the relationship between existing and proposed buildings. Specifically, the Panel was not convinced about the location of the Scamps Nursery and strongly encourages the team to review this. We feel the site suffers from an intensity of parking and given the ambition of the Council and the GLA to increasingly reduce the amount of car usage, we invite the applicant to renegotiate with the local authority the amount of parking provision required. The Panel felt that there are a number of successful aspects of the proposal, such as the massing and articulation, the quality of accommodation and the landscape strategy, but was not fully convinced on materiality and colour proposed for the roofs.

The Panel's detailed comments are set out below:

## **Use**

- The Panel supported the proposal for 100% affordable homes on the site.
- The Panel noted the overall loss of D1/D2 community facilities on the site and understands that the marketing of the existing Strathmore Centre for D1/D2 use has not been successful. Notwithstanding this, it raised the important role of social infrastructure in creating sustainable communities and advised consideration of the impact of the new homes in this and other potential future developments in the area as part of the consideration of the re-provision of site uses.

## **Site Layout**

- The general arrangement of the buildings on site is positive, however the Panel has strong concerns over the siting of the Scamps Nursery. As proposed, the nursery would be located in the same place as existing but further isolated by the car parking area for the new dwellings in front of its entrance, which together with two parking bay driveways requiring crossing for access to the nursery, and the proposed reversing point that crosses the access to the nursery entrance, represents severe safety issues for children and parents approaching Scamps on foot.
- The Panel expressed concern about the separation of the design of the housing by one team, who presented to the Panel, and the design of Scamps by another team, who were not present at the review. To achieve the optimum solution to co-locate the housing and the social infrastructure uses on the site, the Panel encourages the two design teams to review these issues together.
- In order to create a better integration of uses and a much safer arrival environment, the location of education type facilities should be further tested. Nonetheless, the Panel suggests revisiting an earlier option presented at the review where the Scamps Nursery is placed in the upper part of the site, closer to Strathmore Road and to the Stanley Primary School. This would allow for the children to have a more direct access to the centrally located amenity space. This would also not require decant of Scamps Nursery in the development phasing.
- The Panel wonders if switching the nursery with Block A, and test if potentially allocating more mass at the back, would allow for a better distribution of development on site. This would alleviate the tight relationship of Block A to the building immediately to the west.
- The Panel understands the need for compliance with LBRuT parking standards and the desire to retain the existing on-street parking. However, in terms of future sustainability and in order to achieve the most effective use of the site we suggest looking at the wider context and discuss with the highway department the amount of car parking necessary.

- Given the Draft London Plan's desire to achieve 100% electric vehicle provision on new developments, provision for more electric charging points should be made to align with this emerging policy.
- The Panel thinks Block A is located too close to Strathmore Road. Given the strong neighbourhood character of the area and the generosity of space at the rear, we suggest easing back the location of Block A and allowing for the proposed defensible space at the front to be more actively social space.
- The tight strip of land wedged between Block A and the adjacent building on Strathmore Road reads as a left over space that will struggle to find a proper use. Given the amount of space we suggest introducing a more generous and usable space.

### **Height and Massing**

- Overall the distribution of height and massing of the buildings on site is supported. However, in order to create a safer environment for the nursery building, the Panel is not opposed to switch its location with Block A and thus allow for more mass towards the south of the site. The Panel noted that in either location, the nursery building could be extended another storey which could accommodate the lost D1/D2 use, should it be required, without negatively impacting on the extent of housing provision.
- The Panel thinks the front of the development with Block A has a very strong articulation, but the overall character of the development is missing as one enters the site, where car parking and the view towards the substation take predominance. We suggest exploring more the sense of arrival and an overall character for the development, bearing in mind that vistas, and terminations thereof, are important in creating an attractive and welcoming environment.

### **Architecture and Materials**

- The Panel is in favour of a contemporary approach and given the area presents a mix of modern and traditional design elements supports the architectural articulation for the blocks. Some of the Panel feel the curved roof outline, where the metal cladding wraps over, gives the development a dominant and commercial feel rather than a residential character and may be difficult to achieve sufficient quality in execution.
- In relation to the detailing of the façades, the Panel questioned whether the fenestration could be slightly more refined. Particular consideration should be made to the size and position of the windows on Block A which face Stanley Primary School.
- The Panel had some concern over the materials palette proposed and suggests considering a darker shade of zinc for the roofs.
- The location and general arrangement of the flats in Block B is welcome. These are all dual aspects and arranged in small clusters of 6 units around one core, and with good overlooking of the amenity space. However, while in Block A the entrances are generous and clearly defined, in Block B these are very narrow and located next to the refuse stores. The Panel recommends revisiting this to create a clearer wayfinding and more welcoming approach.
- The Panel discussed the possibility of the nursery having a green roof. As a single storey building the roof would be overlooked and thus represents a dominant feature from within the proposed dwellings. Greening it would contribute towards the sustainability of the development as well as adding towards the rich and biodiverse surroundings.

## Landscape

- The baseline landscape and ecology survey work seems sound, while the landscape strategy appears to be well thought through with a sensible retention of the best trees. Also, the play strategy seems to be well considered and appealing to all abilities.
- We encourage the applicant to seek opportunities for greening of the access road to the northern boundary. This would help mitigate the tree loss by the adjacent properties at 21-31 Strathmore Road which have shorter back gardens and are closer to the boundary line. This would also improve the important vista into the site, soften the approach road and give the development a stronger character. This could be achieved by reconsidering the balance of the distribution of footways and parking on the access road.
- Given the family-oriented environment, the Panel encourages the principle that the play area should be open to the wider local community instead of being gated off. As it is such an intimate space with natural surveillance and two well overlooked access points, it would seem unlikely to attract anti-social behaviour and more likely to be attractive to local people who really have a need for playground facilities.
- More details are required on the lighting of the resident's amenity space and the play area.

Yours sincerely



### Gillian Horn

Chair, Richmond Design Review Panel  
Partner, Penoyre & Prasad Architects

### Panel Members

Ann Griffin	Architects Collaborative
Wayne Glaze	Material Architects
Glen Macfarlane	Macfarlane Associates
Holly Barker	Assael Architecture

### Panel Coordinator

Daniela Lucchese	Senior Urban Designer, LB Wandsworth
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### Attendees

James Garside	Senior Planner - Strategic Development, LB Richmond
Marc Wolfe-Cowen	Principal Urban Design Officer, LB Richmond
Martin Elengorn	Councillor, LB Richmond
Jonathan Cardy	Councillor, LB Richmond
Monica Saunders	Councillor, LB Richmond



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## APPENDIX FIVE

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The owner/occupier

Dear Sir/Madam,

**Re: Development proposals for the Strathmore Centre, Strathmore Road.**

I am writing to introduce myself as the Planning Consultant who has been engaged to submit an application for residential redevelopment of the above site.

My client, PA Housing, will be seeking permission from Richmond Council to demolish the Strathmore Centre and construct a new residential development comprising one, two and three bedroom affordable homes.

We are undertaking community consultation prior to submitting the application and as someone likely to be interested in these proposals, we would welcome the opportunity to discuss the scheme with you at this stage and if possible, address any concerns you may have about the development.

We will be holding an informal exhibition on **Tuesday 26<sup>th</sup> November 2019 between 6.00 pm and 8.30pm** at Stanley Junior School when the design team will be available to discuss the scheme and answer any queries relating to this project.

I would be delighted if you are able to attend this exhibition. Please contact me directly if you are unable to attend the exhibition but would like to discuss the scheme.

Yours faithfully

**Robin Harper**  
Chartered Town Planner



**SITE AT THE STRATHMORE CENTRE**

*Public Exhibition Response Form*

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**CONTACT DETAILS (optional)**

**NAME**.....

**ADDRESS**.....

**EMAIL**.....

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**COMMENTS:**

Do you support redevelopment of the Strathmore Centre to provide new affordable homes?  
**YES/NO**

Do you support the proposal to provide a range of unit sizes to meet local housing needs?  
**YES/NO**

Do you consider that the proposal should seek to optimise the development potential of the site in terms of the scale and density of development?  
**YES/NO**

Do you support the proposal to provide a new building for the Scamps nursery?  
**YES/NO**

Do you agree that the scheme should provide sustainable homes in terms of construction, energy use, CO2 omission and drainage?  
**YES/NO**

Do you consider that the scheme should comply with the Council's car and cycle parking standards?  
**YES/NO**

**FURTHER COMMENTS:**

*(continue on reverse side)*



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## **APPENDIX SIX**

## JUSTIFICATION FOR CHANGE OF USE OF STRATHMORE ROAD SITE

### Planning Policy Position

It is recognised that Policy LP 28 of the Local Plan seeks to resist the loss of community facilities unless it can be shown that the facilities are no longer needed or that the service could be adequately re-provided in a different way or elsewhere in a convenient alternative location; and the potential for re-using or developing the site of the same or alternative social infrastructure use has been fully explored. If this evidence is provided the policy states that employment generating uses or wholly affordable housing schemes should be considered.

The supporting text to the policy states, "If a public disposal process has taken place as part of an agreed programme of social infrastructure re-provision which confirms that the disposal of assets is necessary to ensure continued delivery of social infrastructure and related services, this will be taken into account by the Council when assessing proposals against the criteria set out in this policy"

Further, the site is identified as a Site Allocation SA7: *"Social and community infrastructure uses and/or an affordable housing scheme with on-site car parking are the most appropriate land uses for this site"*.

This site has an existing social infrastructure use, which provides a complete range of child-care services for children up to and including Year 6, as well as acting as a nursery to pre-school aged children.

- There is an increasing need for the provision for childcare facilities and nurseries in the borough.
- This site, due to its location in a primarily residential area and its proximity to Stanley School and St James's school, makes it ideal for the provision of nurseries and other child-care services.
- Proposed redevelopment will only be acceptable if the current child-care provision is adequately re-provided in a different way, including the provision of appropriate outside space and parking related to the childcare services, or elsewhere in a convenient alternative location accessible to the current community it supports.
- Only if other alternative social or community infrastructure uses have been explored and options discounted in line with other policies in this Plan, would an affordable housing scheme with on-site car parking be considered as a potential redevelopment option.

Any requirement to undertake a marketing exercise for the site, as required by Policy LP 28, would represent a significant constraint and delay to the redevelopment and provision of the affordable housing.

The site was previously used by Youth Offending Service. These services closed circa 2010 and relocated to Oldfield House as they were no longer required for this purpose or any other purpose that could be identified by the Council. Therefore, the buildings have remained shut (apart from the SCAMP's nursery) for over 7 years. It should be noted however that the Council's commitment is to provide a nursery provider with a new facility which meets the needs of a nursery, as confirmed by AfC, given that the buildings are not fit for purpose due to the condition of the buildings which require significant investment and upgrade.

Consequently, the site was declared surplus to the Council's requirement (as the Council no longer has a need for the property) by Cabinet in November 2010 see <https://cabnet.richmond.gov.uk/documents/g2488/Public%20reports%20pack%20Monday%2008-Nov-2010%2019.30%20Cabinet.pdf?T=10> and the site has remained on the Council's disposal list, which is a publicly accessible document, since that time with periodic updates reported to the Council's Cabinet see this link for copies of the reports <https://cabnet.richmond.gov.uk/mgDelegatedDecisions.aspx?XXR=0&&DR=26%2f09%2f2010-10%2f10%2f2018&ACT=Find&RP=0&K=0&V=2&DM=0&HD=0&DS=0&Next=true&T=505628764&NOW=091018130643&META=mgdelegateddecisions> and which was done as recently as June 2018 - <https://cabnet.richmond.gov.uk/ieListDocuments.aspx?MId=4220> . In that time no group has come forward and identified a need for a community facility and the Council's position has remained that it does not have a use for the buildings.

The importance of retaining D1 use on the site to meet an identified need is recognised in the current development proposals which consists of a new fit for purpose nursery that would be used by SCAMPs. Since October 2017 SCAMPs, Achievement for Children and Property Services have worked together to design a new nursery that would cater for SCAMP's requirements or any other nursery user and the design has been incorporated into the applicant's scheme.

#### Infrastructure Delivery Plan

The Infrastructure Delivery Plan was last updated in 2017.

The plan identified the ability to provide sufficient affordable housing in the borough continues to pose a challenge.

The Local Plan is informed by an up to date borough-wide Strategic Housing Market Assessment (SHMA) (2016). Another indicator of demand is the Richmond Housing Register. According to the Council's Housing Register as at March 2017 there were 2196 households on the Housing Register who have been assessed by the Council to be a reasonable preference category (i.e. having more acute needs). This total includes 201 homeless households for whom the Council accepts it has a duty (under the Housing Act 1996 S193 (2)). Some households on the housing register face issues such as affordability in buying or renting at market levels, overcrowding and poor housing conditions'.

Housing and planning colleagues work closely together, with registered providers and the GLA (who act as the Homes & Communities Agency (HCA) in London), to maximise affordable housing and there is a commitment to maximise resources for schemes that are of a high quality of design and meet the needs of the most vulnerable. It is only through utilisation of Council sites such as this one, that will deliver a 100% affordable housing scheme, that the levels of affordable housing delivery can be maintained or ideally increased not least to get nearer to meeting the Council's affordable delivery targets.

The Borough's Strategic Housing Market Assessment for the period 2014 -2033 identified a net deficit of 964 affordable homes per annum. Bringing forward this site will be in the public interest to help address the urgent demand for affordable housing in the borough for both low cost rented and low cost sale for which there is an evident need. All nominations for the affordable housing when complete will come to the borough and the Council through its tenancy strategy and intermediate housing policy will ensure the homes are affordable and targeted to borough residents.

The applicant, a Registered Provider proposes a development that will reprovide the nursery which is a key objective for the Council who will retain ownership of this building and 100% affordable housing across the site. The Registered Provider has an excellent track record of delivering 100% affordable housing schemes in the borough and is confident that GLA grant funding will be available to support this development. The Council's adopted Local Plan 2018, Policy LP 36, seeks 50% affordable housing in a tenure mix of 80% rent and 20% shared ownership.

The applicants proposals for the site are for 43 dwellings, 100% affordable housing in a notional mix of 80% rent and 20% intermediate housing, subject to viability and are therefore in line with Council priorities asset out in LP 36 of the Local Plan. The scheme proposes that 24% of the rented units are larger family sized accommodation and that overall 80% of all the homes will be family sized dwellings. One and two bedroom dwellings are proposed for the intermediate housing to ensure the homes can be sold in line with the Councils adopted intermediate housing affordability criteria. The rented units will meet the affordability criteria as set out in the Councils Tenancy Strategy. In addition 39 of the homes will meet Building regulations M4 (2) and 4 (10%) with meet M4 (3)

The scheme therefore meets the Council's affordable housing priorities and will make a significant contribution to meeting the affordable housing deficit identified in the SHMA.