

Elleray Hall and North Lane car park, Teddington

Pre-application advice submission: 20/P0247/PREAPP

A new community centre and residential development at Elleray Hall and North Lane Depot / East Car Park, Teddington, TW11 0HG

Officer [REDACTED]

Meeting date: Wednesday 19 August 2020

[Introduction and Proposal](#)

Site:

The scheme incorporates two sites, Elleray Hall and North Lane Depot and East car park.

Elleray Hall is a single storey building, located at the end of Elleray Road, with the junction of Middle Lane. The site is approx. 0.13ha, and the building approximately 510m2. In the northwest corner of the site, accessed off Elleray Road, hard surfacing provides 6 no. car parking spaces plus the provision for a minibus for pick up / drop offs. Whilst the building is not listed nor designated a Building of Townscape Merit (BTM), the properties to the east and west on Middle Lane are BTMs as are some of the properties to the rear on Park Lane.

The hall was previously a well-used facility, providing day care and activities to the elderly, and by other groups out of hours, during the evening and weekends. The submission outlines the building is no longer fit for purposes, as the age and construction means it is inefficient and overly expensive to run, and the layout unsuitable.

The North Lane Depot and East car park are sited to the west of Elleray Hall, located off North Lane and adjacent to Middle Lane. The former depot site is fenced off and currently not in use. The car park, Council owned and run, acts as an overflow car park for the main North Lane car park opposite the site. The combined size of the site is approx. 0.1ha.

[Proposed development](#)

1. The demolition of Elleray Hall
2. Provision of a new community centre on the North Lane depot / car park site
3. Residential development for affordable housing on the former Elleray Hall.

Elleray Hall site	Former Depot / North Lane car park site
16 units: <ul style="list-style-type: none"> • 13 affordable rent units • 3 intermediate units • 12 *1bed / 2 person flats (50m2) • 3 * 2bed / 3 person flats (61m2) • 1 * 1bed / 2 person wheelchair units (61m2) 	536m2 community hall

Relevant Policies



















The LB of Richmond Local Plan and Supplementary Guidance and Documents are available to view on the Council's website www.richmond.gov.uk. Consideration must also be given to policies in the London Plan (and Draft) 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 3rd July 2018. The main Local Plan policies are as follows:

- Policy LP 1: Local Character and Design Quality
- Policy LP 2: Building Heights
- Policy LP 3: Designated Heritage Assets
- Policy LP 4: Non-Designated Heritage Assets
- Policy LP 8: Amenity and Living Conditions
- Policy LP 10: Local Environmental Impacts, Pollution and Land Contamination
- Policy LP 15: Biodiversity
- Policy LP 16: Trees, Woodlands and Landscape
- Policy LP 17: Green Roofs and Walls
- Policy LP 20: Climate Change Adaptation
- Policy LP 21: Flood Risk and Sustainable Drainage
- Policy LP 22: Sustainable Design and Construction
- Policy LP 23: Water Resources and Infrastructure
- Policy LP 24: Waste Management
- Policy LP 28: Social and Community Infrastructure
- Policy LP 30: Health and Wellbeing
- Policy LP 31: Public Open Space, Play Space, Sport and Recreation
- Policy LP 34: New Housing
- Policy LP 35: Housing Mix and Standards
- Policy LP 36: Affordable Housing
- Policy LP 37: Housing Needs of Different Groups
- Policy LP 39: Infill, Backland and Backgarden Development
- Policy LP 44: Sustainable Travel Choices
- Policy LP 45: Parking standards and servicing

Supplementary Planning Documents

- Air Quality  (pdf, 4MB), (adopted 2 June 2020)  (pdf, 73KB)
- Affordable Housing
- Design Quality  (pdf, 2021KB)
- Development Control for Noise Generating and Noise Sensitive Development  (pdf, 2.9 MB) (adopted September 2018  (pdf, 26 KB)  (pdf, 26 KB))
- Planning Obligations  (pdf, 400 KB) (adopted 2 June 2020  (pdf, 72 KB))
- Refuse and Recycling Storage Requirements  (pdf, 134KB) (adopted 8 May 2015  (pdf, 85KB))
- Residential Development Standards  (pdf, 1311KB) and Housing Optional Technical Standards update  (pdf, 32KB)
- Small and Medium Housing Sites  (pdf, 1579KB)
- Sustainable Construction Checklist (adopted 12 January 2016  (pdf, 80KB))
- Transport  (pdf, 865 KB) (adopted 2 June 2020  (pdf, 78 KB)) - questions or queries relating to the application of transport strategy and this SPD should be made to transportation@richmond.gov.uk
- Village Plan - Hampton Wick and Teddington  (pdf, 6.2 MB) (adopted 30 June 2017  (pdf, 27 KB))

- Mayor's Affordable Housing SPG

Professional comments:

Land use – social infrastructure

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

- 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.*
- 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.*
- Be for prices 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:

- 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.*

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.

With respect to land use matters, the submission only states:

1. *It is agreed the existing hall is no longer meeting the needs of the users and cannot be adapted.*
 - a. Who has agreed this?
 - b. Where is the evidence of such?
2. *Confirmation has been received by LBRuT Client Team, stating the proposed community hall, meets the needs of the users.*
 - a. Where is the evidence of such?
 - b. What plans have they reviewed?
 - c. Who was consulted – both the main groups and out of hours groups?
3. The community centre on the North Lane site will be transferred prior to the demolition of the existing hall.
4. The sites will be 'linked' with the housing development enabling the community facilities of Elleray Hall to continue. However, this must be expanded upon – demonstrate via finances?

Following the meeting a community engagement report was provided, which summarises the feedback from respondents regarding the proposal. However, all respondents were grouped (for example, residents, existing facility users etc) and in many cases those using the existing site may have very different views to those living around the site. Therefore, the above questions are still pertinent.

It is apparent there is clearly an identified community need for the facilities, and North Lane east car park is a suitable alternative location for the replacement facilities (and provides comparable floor areas). Therefore, whilst there is a potential for a linked site scheme, any submission must be accompanied with the following information to justify the departure to policy LP 28:

- Details as to how the existing Elleray Hall no longer meets the needs of the users and why the existing building cannot be adapted to achieve such.
- Details as to how the proposed building on North Lane east car park will adequately re-provide the facilities. For example, in terms of floor area, activities, usability of rooms, facilities provided, etc. It is strongly recommended this includes evidence from existing users of Elleray Hall confirming the proposed facilities are adequate.
- Any evidence as to whether the potential of re-using or redeveloping the existing site for the same or an alternative social infrastructure has been explored (i.e. marketing). If this has not been undertaken, justification must be provided for such a departure to policy. This may include:
 - Disposal of the site / housing is necessary to ensure continued delivery of social infrastructure and related services elsewhere
 - The loss of the site is offset through securing a community use on the North Lane site. (When this is outlined, it should be demonstrated the loss of the off-street parking can be accommodated elsewhere locally without harming the vitality of the Centre); and the replacement facilities will be provided prior to any demolition taking place on Elleray Hall site.
 - Benefits derived from the affordable housing scheme.

Finally, with respect to the Government's recent changes to the use classes order, the proposed community centre is described as a D1 use and day centres are specified in the new class E, albeit other community type uses go into the new F1 use class. To ensure the site remains in a community infrastructure use, it is deemed justified to use conditions to restrict future flexibility.

Land use - Affordable Housing

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) A contribution towards affordable housing will be expected on all housing sites. On all other sites capable of ten or more units gross 50% on-site provision. Where possible, a greater proportion than 50% affordable housing on individual sites should be achieved.*
- c) 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.*

The scheme proposes 16 units, and therefore 50% on site affordable housing provision is required. The scheme is proposing 100% affordable housing provision, with the proposed split of 80% affordable rent (13 units) and 20% intermediate (3 units). The applicants are advised:

The content and quantum of Affordable Housing:

The affordable housing content proposes a policy compliant tenure mix 13:3 i.e. 80:20 Affordable Rent: Shared Ownership. This meets the Council’s planning policy requirements. The unit size by tenure is not confirmed at this stage. The Assistant Director for Housing Strategy Development (ADHSD) would prefer an improved mix of unit sizes for the rented homes in order to address the need for family sized rented homes. It is recognised that this location close to local facilities in Teddington Town Centre as well as the new Elleray Hall would make this site particularly attractive to older tenants including those seeking to downsize from larger social rent homes. The latter scenario would be beneficial to the Council in releasing larger family sized homes. The suitability of the location for older people could enable development by an Almshouses provider as well as Registered Providers. (However, if provision is in the form of Almshouses – this may not meet Policy LP36 in terms of meeting the national definition of affordable housing (in terms of nominations and affordability) although it may provide charitable housing)

Officers recognise that due to site constraints and viability the scheme may have limited scope to achieve a higher level of family sized accommodation and that the proposals aim to configure the units to make maximum use of floor areas available.

Although the scheme is currently proposed as a mixed rented/intermediate scheme the ADHSD would support a 100% rented proposal in order to ensure that the scheme can be marketed to both RPs and almshouse provider, albeit that any final affordable mix will be dependent on viability.

If any market homes are proposed (as the scheme develops) it is expected the application to be accompanied by evidence of viability to demonstrate that the scheme provides the maximum reasonable amount of affordable housing, taking account of the availability of public

grant both (Mayoral and the Council's Housing Capital Grant funding) and the benefit that additional low cost rent housing has meeting priority housing need.

It is noted that the scheme as currently proposed is divided into four separate cores, thereby enabling a mixed tenure whether as 100% affordable housing or a mix of affordable and open market sale.

Affordable housing values are best applied using actual RP offers rather than blended modelling which can distort the likely achievable revenue therefore confirmation of engagement with and the actual best offer from RPs for the proposed affordable housing which takes account of the Council's adopted policies on rent setting, shared ownership affordability, changes to future national rent policy and availability of public subsidy would be expected as soon as possible. This should therefore be provided in accordance with the Affordable Housing SPD.

Any submission must be accompanied with evidence of discussions between the RP and the Councils Housing Development Team [REDACTED] and [REDACTED] to ensure the mix (associated to tenure) reflects local needs. Further, details of nominations are necessary.

London Affordable Rent

Rent levels for the rented homes will need to be set at London Affordable Rent (or an equivalent rent) if managed by an almshouse/other charitable housing provider. As London Affordable Rent excludes service charges, the housing provider will need to confirm the affordability of the rent including service charge. In order to encourage moves from existing social rent housing there is likely to be a need to be a level of flexibility in setting rents lower than LAR and this is something that would be addressed post planning but can be recognised in any legal agreement.

Shared Ownership/London Living Rent

At this stage it is unlikely that the shared ownership homes would meet the requirements of the Council's Intermediate Housing Policy that they should be affordable to those with household incomes not exceeding £47,000. Further evidence of affordability should be confirmed by the Registered Provider confirmed as the development partner. Provision of London Living Rent as an alternative would be supported by the ADHSD since the one bedroom flat ward level rent for Teddington (£1119 per month) would require an income of around £50,000.

In summary and as presented. the 100% affordable housing is welcomes, subject to viability, making a valuable contribution to the Borough's housing needs through use of Council owned land.

Residential standards:

Policy LP35 sets out the necessary 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 – 5m² 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".

- *Mix:* The scheme however provides a large proportion (13) of small units (1 beds). Whilst the site is not within a centre boundary, given the location immediately adjacent to Teddington, and these properties having easy access to facilities, amenities and public transport, the mix is not unreasonable, subject to the tenure reflecting local need. (There is concern as to how the 1bed units will fit in with the 80:20 split given the local need for affordable rented accommodation focuses on family accommodation – see previous comments).
- *Internal space standards:* The submission confirms the scheme meets the Nationally Described Space Standards, which is welcomed.
- *External space standards:* Seven flats appear to have private amenity space, that exceed the necessary standards. However, the remaining do not benefit from any private amenity space, rather have a communal garden to the west of the building. It is recommended the scheme demonstrates how this is valuable amenity space, rather than just a walk through to the bin and cycle store and pathway to each unit. Details of access to and management of this space would need to be confirmed to ensure access by all the residents.

It is also noted that none of the 2bed units benefit from any external amenity space. Could the layout be reconfigured to allow these family units benefit from a private garden?

In addition, none of the upper floor flats have balcony amenity space. Whilst this would not be an issue for Intermediate units, it could raise funding issues in relation to the Mayoral Affordable Housing grant.

- *Accessibility:* There do not appear to be any details with the submission regarding compliance, which will be necessary in any forthcoming submission. At least 10% of the homes are required to be designed to be wheelchair accessible Approved Document M Volume 1 (Building Regs M4(2) Category 3 compliant), i.e. two homes, however only one is identified as wheelchair accessible. There appears to be potential to adapt the 2 bed 3 person ground floor unit to an additional wheelchair accessible home. In providing the additional units, provision of a parking space for both units would be required. Further comments on the design and layout of the scheme will be provided by [redacted] Specialist Housing Occupational Therapist, Housing Strategy and Development [redacted]

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*

Through policy LP 4: Non-Designated Heritage Assets, the Council seeks to preserve, and where possible enhance, the significance, character and setting of non-designated heritage assets, including Buildings of Townscape Merit.

Both sites will represent infill developments and to a degree backland, and therefore policy LP39 ‘Infill, Backland and Backgarden Development’ applies:

- A. All infill and backland development must reflect the character of the surrounding area and protect the amenity and living conditions of neighbours. In considering such applications, the following should be addressed:*
 - 1. Retain plots of sufficient width for adequate separation between dwellings;*
 - 2. Retain similar spacing between new buildings to any established spacing;*
 - 3. Retain appropriate garden space for adjacent dwellings;*
 - 4. Respect the local context*
 - 5. Enhance the street frontage taking account of local character;*
 - 6. Incorporate or reflect materials and detailing on existing dwellings*
 - 7. Retain or re-provide features important to character, appearance or wildlife*
 - 8. Result in no unacceptable adverse impact on neighbours,*
 - 9. Provide adequate servicing, recycling and refuse storage as well as cycle parking;*
 - 10. Result in no unacceptable impact on neighbours in terms of visual impact, noise or light from vehicular access or car parking.*
- B. Backgarden Development: There is a presumption against loss of back gardens due to the need to maintain local character, amenity space and biodiversity. Back garden land which contributes either individually or as part of a larger swathe of green space to amenity of residents or provides wildlife habitats must be retained. In some cases, a limited scale of backgarden development may be considered acceptable if it complies*

with the factors set out in A above. Development on backgarden sites must be more intimate in scale and lower than frontage properties.

Small and Medium Housing Sites SPD sets out standards for separating distances (between properties), which should be met:

- *The windows of main facing habitable rooms (reception rooms, dining-kitchen and bedrooms) should preferably be no less than 20m apart*
- *Where principal windows face a wall that contains no windows or those that are occluded (bathrooms for example) separate distances can be reduced to 13.5m.*

No's 13-27 Middle Lane are designated BTMs. Any development will need to demonstrate how the scheme preserves their significance.

Elleray Hall site: The site is sandwiched between BTMs. Whilst there is no objection to the loss of the existing building, which does not positively contribute to the local area, any development must be a high standard of design, that preserves the setting and significance of the adjacent BTMs.

The scheme is a flatted development; however, it has been designed to appear as two houses on the street frontage, which is successful, and responds to the adjacent properties in terms of building line and low gradient pitched roof. The success of any design depends on detail, and therefore it is recommended an analysis of the adjacent properties are undertaken to establish reveal depths, detailing, floor and windows proportions, to ensure these are all compatible and enable maximum integration into the streetscene.

The site already accommodates a large building and therefore there is no objection in principle to the provision of a rear wing, responding to the shape of the site. Also, it is welcomed that the height is lower than the frontage. Given the varied design of the adjacent buildings and the design of the existing building, there is scope for a more modern approach. Details of the materiality are required. The green roof is welcomed.

North Lane site: North Lane supports are varied character of buildings, with the Tesco's building and open car park to the west, the two storey cottages to the east side of the road, recently constructed 2-3 storey properties and 1960/1970 properties to the south.

Any community building is going to be of a different character to the surrounding context, by virtue of its function. However, any submission should demonstrate why this is of an exceptional design and responds and respects to local character. No design and access statement have been provided showing considerations and impact on heritage assets, and therefore comments are very brief and informal:

- Whilst the height may respect the adjacent properties, the roof gradient is awkward, too steep and results in a top-heavy appearance.
- The front elevation lacks interest with only one window in each wing.
- Lack of identity
- No details on materiality
- Concern regarding overdevelopment of the site – refer to residential amenity section.

Transport/parking/cycling

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. A summary of key policy requirements are as follows:

1. *High trip generating development should be in areas with good public transport with enough 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. *For public halls, the parking standards are 1 space per 10 persons/seats. 1 coach space per 50 persons/seats. Off street servicing.*
 - d. *Adequate parking spaces for disabled people must be provided preferably on-site*
 - e. *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. *Managing the level of publicly available car parking to support the vitality and viability of town and local centres within the borough whilst limiting its impacts on the road network.*
6. *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 above two points are agreed by the applicant.

Car parking:

Loss of North Lane (East) car park: The site currently provides 27 car parking spaces, and operates Monday to Saturday, 8am-6.30pm. The scheme will result in the loss of such facility.

Any submission will need to undertake a parking survey of existing car park to ascertain usage; whether other existing car parking in the locality (namely North Lane West) can cater for any loss; and the implications of such loss to ensure this does not harm the vitality and viability of Teddington Centre.

The submission states a parking survey has been carried out by Paul Mew Associates that concludes “parking stress levels will remain below 85% threshold prescribed by Richmond Borough Council”. Details were provided following the initial meeting. These confirmed the following:

Baseline details:

- Kerbside survey – undertaken within 200m, with capacity for 171 spaces
- North Lane west car park – capacity for 86 car parking spaces
- North Lane east car park – capacity for 21 car parking spaces

Results:

Survey	Results
Overnight	Kerbside parking: 71% parking saturation, with 52 spaces available North Lane west car park: 85 spaces available.
Daytime	Kerbside parking: 85% parking saturation, with 31 spaces available. North Lane west car park: 29 space available.
Evening	Kerbside: 80% parking saturation, with 35 spaces available North Lane west car park: 48 spaces available

Analysis of results:

- During the day, kerbside parking is high at 85%. This lessons during the evening and overnight.
- During the day, evening and overnight, the North Lane west car park has capacity to accommodate those spaces lost at North Lane east car park.

The Council’s transport planner has the following comments to make:

- The parking survey seems to be for a different scheme – number of units etc.
- Confirmation the North Lane west car park can be accessed over night for parking.
- The car park at North Lane West has a maximum stay of three hours, between 08.00 and 18.30, Monday – Saturday. Therefore, it is recommended this is not included in any survey because residents would have to park elsewhere during its hours of operation.
- It would be beneficial to have full details of the usage of the car parks.
- The five spaces behind the shops east of the highway boundary on Elleray Road should not be included because this area is private land and would not be available to park on.

Proposed parking:

North Lane is not located within a CPZ, however, the Council has recently undertaken ‘the Teddington / Strawberry Hill area parking study’. https://www.richmond.gov.uk/services/roads_and_transport/transport_planning/parking_reviews/teddington_parking_review_existing_cpzs

Elleray Road is designated Z1 CPZ, which operations Monday to Sunday, including Bank Holidays between 8:30am to 10pm. Any scheme will require a legal agreement to remove residential CPZ permits (for existing and future CPZs), which the applicant has agreed with.

The Elleray Hall residential redevelopment could provide a maximum of 16 parking spaces on site to comply with the standards. The scheme proposes 1 disabled parking bay, and the use of a car club on the North Lane site.

Whilst the site only has a PTAL rating of 3, given the location adjacent to the Teddington centre, access to public transport – both bus routes and the train station, the non-family nature of the majority of units on site, the provision of a disabled parking bay, and agreement to restrict CPZ permits, on balance this is may be acceptable (subject to the parking survey) and more benefitable use of the site.

The north Lane site generates the following parking standards:

- 1 space per 10 persons / seats
- 1 coach per 50 persons
- Off-street servicing.

The submission states, the hall is 536m², and using Building Regulation guidelines, this could provide an occupancy level of 300 people (maximum), and therefore, a maximum of 30 spaces, 6 coaches and off-street servicing could be provided. It is highly unrealistic to provide such level of parking in this location. The scheme provides 3 parking bays, 1 disabled bay, 1 minimum bus and 1 car club bay.

To allow the transport planners to assess the likely demand for parking for the community centre, the submission would need to be accompanied with a TRICS survey of community hall land uses of a similar nature and location (in terms of PTAL) with a multi-modal analysis of those trips, and then use this data to complete a car park utilisation survey.

The scheme falls short of the maximum standards, and therefore it is necessary to demonstrate the scheme provides for the needs of the development. The submission stated the parking provision was established following consultation with the user group, and the quantum of parking is acceptable. Evidence of such will be required (the details provided in the community engagement are not sufficient, as the evidence needs to be provided from specific users rather than all respondents grouped together). Also, it is recommended any further evidence on travel patterns of the users is provided to support such.

[Vehicular Access to the site which will accommodate the community hall](#)

From the plans provided, it appears the scheme relocates the existing vehicular crossover on the eastern side of North Lane to a location 4m north of the current one. To do this the applicants will need to enter into an agreement with the Local Highway Authority under S278 of the Highways Act 1980. They will also need to restore the current crossover access to the level of the surrounding footway.

The scheme proposes a new dropped kerb access immediately to the east of the proposed flats on the southern side of Middle Lane to allow access to a proposed disabled parking bay. This proposed dropped kerb will require the technical approval of the Borough Engineer under the same agreement as the new access. Please see the document in the link below for details on the technical standards that dropped kerb accesses must meet: https://www.richmond.gov.uk/media/19285/richmond_transport_spd.pdf

The provision of the dropped kerb at the exact location might not be achievable due to the need for the applicant to be able to achieve pedestrian visibility splays of 2.1m x 2.4m in both directions from the northern edge of the proposed disabled bay. Visibility in an easterly direction is constrained due to the height of the fence that borders the western boundary of 15

Middle Lane. This fence may have to be reduced in height to 0.6m in accordance with the technical standards set out in the SPD to allow motorists safe access and egress.

In addition to the above, there are concerns with the proposed layout:

- The disabled bay falls short of the minimum space standards
- The space immediately south of the hall has poor visibility
- The scheme needs to demonstrate manoeuvrability from all spaces – it is envisaged, further space is needed to the south of the spaces, so vehicles can reverse and turn out of the most southern spaces.
- Turning circles for the minibus space is required
- Clear pedestrians’ routes into the building should be provided to demonstrate no unacceptable conflict

Electric car parking points:

Policy requires 20% of all spaces must be for electric vehicles with an additional 20% for passive provision. 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. This has been agreed with the applicant, which is welcomed.

Cycling

Within the Elleray Hall site, the scheme proposes two bike stores, and on the North Lane site, a bike rack is proposed. Notwithstanding, it is unclear how many spaces are proposed. Adopted standards require the following (all of which are covered and secure):

Elleray Hall	<ul style="list-style-type: none"> • Long stay: 1 space for 1bed and 2 spaces for 2 bed • Short stay: 1 space per 40 units • Total: 20 spaces for the residential element
North Lane	<ul style="list-style-type: none"> • Long stay: 1 space per 8 staff • Short stay: 1 space for 100m2

The applicant will need to demonstrate that they can meet the standards set out in the current London Plan which can be accessed at: <https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan/london-plan-chapter-six-londons-transport-2>

Servicing Management Plan

- Any application must be accompanied with a servicing management plan. This has been agreed by the applicant.

Construction

The submission will be expected to provide a Construction Management Plan / Logistics Plan (CMP / CLP). The Local Validation Checklist (available to view on the Councils website) outlines the specific detail as to what is required. This will include (but not be limited to):

- How many construction vehicles will use the site per day?
- The proposed construction access and routes to and from the site
- The type of vehicles to be used
- A project phasing plan
- 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.

More information can be found at: <http://content.tfl.gov.uk/construction-logistics-plan-guidance.pdf>

Refuse:

- Ellera Hall site: Two refuse enclosures are proposed, one adjacent to the disabled parking space and the other adjacent to the west boundary.
- North Lane site: No refuse or recycling facilities are shown on the site layout.

Officers have the following comments:

- Any scheme needs to demonstrate it meets the criteria set out in the Council's Refuse and Recycling supplementary planning document, in terms of quantum, location, access and design, which can be accessed at: https://www.richmond.gov.uk/media/7627/refuse_and_recycling_storage_requirements_spd.pdf
- Full details of storage and servicing arrangements are necessary for North Lane site.
- Scaled drawings have not been provided, however, the push distance for the bins should be no more than 20m and should be free of steps or steep slopes. This should be confirmed on the plans.
- Whilst not policy, where practicable a storage area for bulky waste (white goods etc) awaiting collection would be useful.

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 surround both sites. A site visit has not been undertaken, nor has a sunlight / daylight report been submitted (which will be required with any submission); therefore, these comments are given without prejudice and may be subject to change. It is also strongly encouraged when public consultation is undertaken, direct communication is made with the adjoining neighbours to establish the siting of windows that overlook the site, and the rooms these serve. Officers will be doing the same when an application is submitted, and it is beneficial to identify these earlier rather than later in case amendments are necessary.

Ellera Hall site:

The frontage building is set off the boundary with No. 15 and 21, broadly respects these properties front and rear building lines, however, the front elevation is only 4.7m to the south elevation of No. 26 Ellera Road. The rear wing curves towards the west boundary. This remains off the side boundaries by between 5-9m, however, there are pinch points, particularly

to the rear of Flat 13. The western flank remains 5.8m off the boundary and 13m from 51 North Lane.

- No. 15 Middle Lane: This property has windows on the flank elevation, facing the site. However, it is unclear what rooms these serve. If they are non-habitable, the relationship may be acceptable. The property benefits from a substantial garden. Whilst the rear wing extends along this in its entirety, given the location of the existing hall, the siting off the boundary, and the orientation of the windows, this may be acceptable. It is however recommended that any submission provides further presentational material – for example, overlays of the existing hall on the proposed site plans and sections through the existing / proposed building so where there is additional / lesser bulk, this can be clearly seen.
- No. 21 Middle Lane: This property has windows off the flank. Again, it is necessary to identify the rooms these serve. If these are habitable, there may be issue of light and privacy. Whilst the rear wing curves round to the rear of their garden, given the siting off the boundary, orientation of the windows, length of their garden and separating distances, this may be acceptable. The scheme proposes the main access route to the rear of the adjacent to the boundary with No. 21. It is recommended there is an acoustic fence, substantial screening, and the pathway siting off the boundary to prevent this causing undue disturbance. Similarly, bin and refuse stores should not be siting immediately adjacent to the boundary or No. 21's rear garden without some form of mitigation.
- No. 26 Elleray Road: The frontage building is only 4.7m from the south boundary of this property, overlapping their rear elevation. A first-floor front elevation window, serving a living / dining room is proposed. It is recommended this is obscure glazed to ensure it doesn't cause undue loss of privacy. Given the modest projection beyond the rear elevation and the separating distances, this is not deemed to appear overly intrusive.
- Properties in Park Lane: By reason of the length of these gardens, siting off the boundaries (in most part), and the orientation of the windows, this relationship may be acceptable. However, the pinch point with No. 22 is unfortunate, and it is recommended further detail is provided on this – what is the actual gap? ability for maintenance? etc.
- North Lane properties: The western flank wall (flats 14 and 16) are only 13m from the rear of No. 51. This falls short of the SPD 'Small and Medium Housing Sites' standard of 13.5m, nor has justification been put forward as to why this should be deemed acceptable. It is therefore recommended this is pulled in to ensure a minimum gap of 13.5m with the rear flank wall of No. 51.

North Lane Depot / Car Park:

No 21 North Lane: This is a two-storey property, with a window on the flank elevation at ground floor level, and a rear single storey outrigger. The proposed building is only sited 1m off its north boundary and extends 12m past their main rear building line and the full length of the garden. The eaves level is 3.2, rising to 7.1m. There are objections with the proposed layout, whereby it will appear overbearing. If a building is to be proposed in this location on this footprint, the scale needs to be reduced so not to appear unneighbourly. This involves reducing the eave height, ridge height and the gradient of the roof. Velux's are proposed on the north roof slope. It will be necessary to demonstrate these do not cause overlooking – for example, the lowest level should not be 1.75m or less from the finished floor level. Alternatively, these will need to be obscure glazed and non-openable.

No. 21 – 27 Middle Lane: These properties are accessed via the pedestrian footpath and face onto the south boundary of the site. The southern wing of the community hall is 9-11m from these properties. Whilst this falls below the recommended 13.5m guidelines, given it effects the front elevation, is across a public footpath, and it is not so dissimilar to the relationship of No. 13 & 15 Middle Lane with No. 19 Elleray Road, this may be acceptable. It is recommendation any submission provides examples / visualisations of similar relationship so neighbours and the community can understand the rationale behind the layout.

No. 16 – 26 Elleray Road: These properties adjoin the sites east boundary. The community hall comes within 1.4m – 8.7m to the boundary. The submission indicates a lowering in ground level. Whilst the eave height remains below the fence line of these gardens, the concerns comes from the proximity of the building in response to the roof height and corresponding pitch. No part of the roof should come within 13.5m of these properties’ rear elevation. (This is adopting the same standard as set out in SPD – a rear elevation facing onto a flank elevation).

No details of the proposed activities have been provided. Any submission will need to be accompanied with noise reports, to demonstrate the use will not cause unacceptable noise spill to neighbouring properties.

Other matters:

The applicants are made aware of other material planning considerations and their specific policies that any scheme would be assessed against, as summarised below:

<p>Trees landscaping</p>	<p><i>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:</i></p> <ol style="list-style-type: none"> <i>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;</i> <i>2. resist development which results in the damage or loss of trees that are considered to be of townscape or amenity value;</i> <i>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);</i> <i>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).</i> <i>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;</i> <i>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;</i>
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	<p>Comment: Prior to establishing a site layout, a tree survey should be undertaken to ascertain the location, size, health and amenity value of trees both on and off site. It is recommended this is provided urgently, and consequently any comments provided in this response may change once this information has been provided.</p>
Ecology	<p><i>LP 15 seeks to preserve and where possible enhance the Borough's biodiversity and specifically requires new development to:</i></p> <ul style="list-style-type: none"> • <i>Support enhancements to biodiversity</i> • <i>incorporate and create new habitats or biodiversity features, including trees, into development sites and into the design of buildings themselves where appropriate;</i> • <i>deliver net gain for biodiversity, through incorporation of ecological enhancements, wherever possible;</i> • <i>ensure new biodiversity features or habitats connect to the wider ecological and green infrastructure networks and complement surrounding habitats;</i> • <i>enhance wildlife corridors for the movement of species, including river corridors, where opportunities arise; and</i> • <i>maximise the provision of soft landscaping, including trees, shrubs and other vegetation that support the borough-wide Biodiversity Action Plan.</i> <p>Comment: Any submission should demonstrate compliance with the above-mentioned policies. Also refer to the validation requirement in terms of the documents that will be necessary at submission.</p>
Flood risk	<p><i>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.</i></p> <p>Comment: Whilst the site is within flood zone 1, it is within a critical drainage area and area susceptible to surface water flooding. It is also a major application. As such, the following will be required:</p> <ul style="list-style-type: none"> • a Flood Risk Assessment • a Drainage statement and use of Sustainable Drainage Systems • a reduction in surface water discharge to greenfield run-off rates will be required. • Compliance with the London Plan drainage hierarchy
Pollution (air, noise, odour)	<p><i>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'</i></p> <p><i>Comments:</i></p> <ul style="list-style-type: none"> • Air Quality Impact Assessment will be required, demonstrating air quality neutral (refer to recently adopted SPD) • Acoustic Report for the community hall • If a commercial kitchen is proposed within the community hall, it will be necessary to provide details of odour controls.
Sustainability	<p><i>Policies LP 20 (Climate Change Adaption) and LP 22 (Sustainable Design and Construction) outline the necessary sustainability credentials</i></p>

	<p><i>of any forthcoming scheme. The following must be reflected in any forthcoming scheme:</i></p> <ol style="list-style-type: none"> 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 replacement hall is over 100m², and therefore will be required to: <ul style="list-style-type: none"> • Meet BREEAM 'Excellent' standard. • 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, NO_x boilers to reduce the amount of NO_x 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. <p>The submission confirms:</p> <ul style="list-style-type: none"> • The new community centre will achieve BREAAAM Excellent • The housing will be zero carbon • Over 70% roof coverage will incorporate a green roof • National Water Standards for maximum consumption will be met. <p>Whilst such confirmation is welcomed, details of such are necessary. In addition, the remaining considerations listed above (boilers, decentralisation, sustainable construction checklist remain outstanding)</p>
<p>Open space</p>	<p><i>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</i></p>

	<p><i>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.</i></p> <p>Comments:</p> <ul style="list-style-type: none"> • Refer to policy requirements outlined above.
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Procedural matters

1. It is acknowledged further stakeholder and public consultation will take place. Whilst this is welcomed, there are a number of fundamental aspects missing from the submission, including tree report, which will influence the siting of the building. It is recommended this is provided and the layout amended if necessary, prior to consultation. In addition, any engagement must be meaningful, with scope to change if found necessary.
2. Officers welcome the applicant's commitment to enter into a PPA. Submission requirements will be outlined within this document.
3. The submission states that the applicant agree for the scheme to be put before the Richmond Design Review Panel. It is recommended the applicants / agent contact [REDACTED] to make the necessary arrangements.

Summary

In summary, whilst there are aspects of the development are supported, notably, the affordable housing and the reprovision of the community hall, there are a number of outstanding matters that need to be resolved prior to submission (see letter for full detail):

- Social infrastructure:
 - Existing community hall – how this does not meet the needs of the users
 - Proposed community hall – evidence as to how this meets the needs of existing users
 - Evidence that other social infrastructure uses for the site have been explored, or justification for lack of evidence.
- Affordable housing:
 - Confirmation that the housing meets local needs in terms of tenure, affordability, mix, tenancy strategy, design
- Residential standards
 - Adjusting the external amenity space
 - Demonstrating compliance with the Building Regulations M4(3) and (4)
- Siting and design:
 - Provision of further detail and visualisations
 - North Lane – amendments to design to ensure this is exceptional design
- Transport:
 - Further details in the TA and TRICS assessment
 - Confirm the proposed parking arrangements meet the needs of the community hall users

- Amendments to the layout of the access and parking arrangements on North Lane site
- Provision of cycle storage to comply with standards
- Full details of refuse and recycling
- Residential amenity:
 - Details of adjoining properties layout and improved presentational material
 - Elleray Hall site: Increase in separation distances with North Lane properties; adjust location of refuse / cycling stores;
 - North Lane site: Mitigation needed in design / scale of building to reduce impact on properties in North Lane and Elleray Road, resulting from siting, eave height and gradient of roof;
- Refer to 'Other Matters' section for policy requirements on matters such as trees, ecology, flood risk, pollution, sustainability, open space (feedback has not been provided given the lack of information submitted).

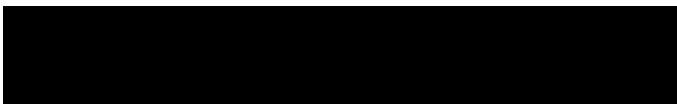
Without prejudice

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



From: [REDACTED]
Sent: 30 March 2021 10:15
To: [REDACTED]
Subject: FW: ERH - ASHPs Options

[REDACTED] from my understanding there are two options, the ASHPs either to be sited in the corner of the site adjacent to the bike store, or on the roof of the development (0.7m in height). Based on the information provided, I cannot confirm the LPAs preference.

I think the siting on the ground in the corner of the site potentially may raise issues – loss of large amount of space, adjacent to a number of residential properties and gardens, noise disturbance.

Whilst you state the siting on the roof may be intrusive and whilst elevations have been provided, it is unclear as to whether these will be visible from any public vantage points or private gardens – or will they only be visible from upper floor windows of surrounding properties? (this point is critical) Also, can they be grouped together toward the frontage building? Also, how do they interact visually with the solar panels? Could they be designed and screened to look like modern chimney type elements?

Would there be an alternative option – placing each ASHP in the individual gardens?

In terms of noise levels, the LPA usually imposes the following condition – so levels should comply with this:

1. Prior to the first use of any mechanical services plant (including heating, ventilation, air conditioning and kitchen extraction plant) to which the application refers a scheme shall be submitted to and approved in writing by the Local Planning Authority which demonstrates that the cumulative measured or calculated rating level of noise emitted from the mechanical services plant to which the application refers shall remain at least 5dB(A) or (10dB(A) below if there is a particular tonal or discrete component to the noise,) below the existing background noise levels.
 - a. The measured or calculated noise levels shall be determined at the boundary of the nearest ground floor noise sensitive premises or 1 metre from the facade of the nearest first floor (or higher) noise sensitive premises, and in accordance to the latest British Standard 4142. An alternative position for assessment /measurement may be used to allow ease of access, this must be shown on a map and noise propagation calculations detailed to show how the design criteria is achieved.
 - b. The plant shall be isolated on adequate proprietary anti-vibration mounts so as to ensure that vibration amplitudes which causes re-radiated noise do not to exceed Official the limits detailed in table 4 detailed in section 7.7.2 of BS8233:2014 Guidance on sound insulation and noise reduction for buildings and to prevent the structural transmission of vibration and regenerated noise within adjacent or adjoining premises, and these shall be so maintained thereafter.
 2. Within 2 weeks of the mechanical services being used, a commissioning acoustic test shall be undertaken, and a report detailing the results of the tests to demonstrate that part 1 of the conditions has been achieved shall be submitted to and approved in writing by the Local Planning Authority. Where the requirements outlined in (1) are not met, a mitigation scheme shall accompany the report to be approved in writing by the Local Planning Authority.
 3. The mechanical plant shall not be used other than in accordance with approved details.
- REASON: In order to safeguard the amenities of neighbouring residents

More information can be found on our website - [development control noise generation noise sensitive development spd adopted september 2018.pdf](https://www.richmond.gov.uk/development-control-noise-generation-noise-sensitive-development-spd-adopted-september-2018.pdf) ([richmond.gov.uk](https://www.richmond.gov.uk))

[REDACTED]
Serving Richmond and Wandsworth Councils

Tel: [REDACTED]
Email: [REDACTED]
Web: www.richmond.gov.uk / www.wandsworth.gov.uk

This e-mail contains my opinion only that I give without prejudice to any consideration that the Local Planning Authority may give to an application on this site in the future.

The information in this email together with any attachments is confidential. If you have received this message in error you must not print off, copy, use or disclose the contents but must delete it from your system and inform the sender of the error. You should be aware that all emails received and sent by the London Borough of Richmond upon Thames may be stored or monitored, or disclosed to authorised third parties, in accordance with relevant legislation.

From: [REDACTED]
Sent: 25 March 2021 12:37
To: [REDACTED]
Subject: FW: ERH - ASHPs Options

[REDACTED]
As recently discussed please find attached ERH Housing Elevations drawings with 2 options for the location of ASHPs.

1. SW site boundary

The siting of this option is 1m away from the site boundary (following planning guidance) the outbuilding on No. 21 neighbours' land, which they have noted is used as a 'living space'???. The manufacturers state that 1 unit has a sound power level of 53 dBA, 2 would have 56 dBA. However, they were not able to calculate the dB levels for 8 units. We will have to commission a sound engineer to determine what the noise level will be immediately behind the garden walls in the neighbouring properties. We propose a brick wall to the West with sound absorbent lining to reduce the noise impact. Can you confirm please if you have any data on what would be acceptable noise levels in these rear back gardens.

2. On the roof

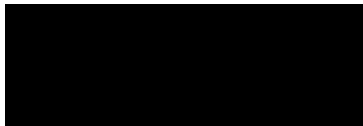
From design perspective, this is not ideal as it would look rather unsightly even installed in the centre of the roof. They would have a visual screen, but even so are 700mm high (500mm above parapet level) and will not be a pretty sight.

We think option1 will be the best solution if we can get the dB down to an acceptable level. Can you confirm please if you have any data on what would be acceptable noise levels in these rear back gardens.

Also, whilst we are aiming to keep the height of the rear mews down, to minimise any impact to neighbours, we have currently used 2.4m floor to ceiling heights. This exceeded the National Housing Standard of 2.3m. Now reviewing The London Plan 2021, the minimum has changed to 2.5m.

Could you confirm whether this latter dimension needs to be complied with or whether this particular site situation warrants a reduced height.

Thanks
[REDACTED]



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From: [Redacted]
Sent: 24 March 2021 23:20
To: [Redacted]
Subject: FW: ERH - ASHPs Options

Draft to [Redacted]

Please find attached ERH Housing Elevations drawings with 2 options for the location of ASHPs.

1. SW site boundary

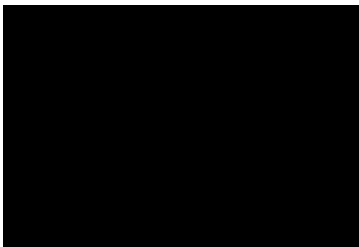
The siting of this option is 1m away from the site boundary (following planning guidance) but right next to the outbuilding on No. 21 neighbours' land, which as they have noted is used as a 'living space'. They have already expressed their concerns about the impact of the development to their property in particular with regards to bins, access and overlooking. Introducing a plant in that corner could further aggravate the conflict. We sought advice on the noise disturbance from the acoustic engineers working for Elleray hall, however, they are not willing to provide guidance on the housing unless appointed to do so. The information we managed to obtain from the manufacturers of the product we are specifying suggests that 1 unit has a sound power level of 53 dBA, 2 would have 56 dBA – product datasheet attached. However, they were not able to calculate the dB levels for 8 units. We propose a brick wall to the West with sound absorbent lining to reduce the noise impact. We would need confirmation that the reduction will be sufficient.

2. On the roof

From design perspective, this is not ideal as it would look rather unsightly even installed 1m away from the edge of the flat roof following planning guidance. From technical perspective, this is not ideal as it exposes the units to direct sunlight and wind.

Perhaps a third option is to place Individual units in each garden. This would be the most efficient option (least pipework), however, technical experts say the units should be left open rather than enclosed in wooden structures which is not ideal either.

Kind regards,



Microsoft Word document content, partially obscured by redaction bars.



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[REDACTED]

From: [REDACTED]
Sent: 31 March 2021 10:58
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Elleray Hall Housing - Floor to Ceiling Heights?

Official

I'm sure I responded to you regarding the height. Never mind.

Yes, I would go with the 2.5m height, as required by the London Plan. However, it will still be necessary to demonstrate the development does not appear unneighbourly from the adjacent residential properties, taking into account policy LP8 and SPD 'small and medium housing sites', particularly in terms of distances, light and privacy.

[REDACTED]

Serving Richmond and Wandsworth Councils

Tel: [REDACTED]
Email: [REDACTED]
Web: www.richmond.gov.uk / www.wandsworth.gov.uk

This e-mail contains my opinion only that I give without prejudice to any consideration that the Local Planning Authority may give to an application on this site in the future.

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From: [REDACTED]
Sent: 30 March 2021 13:32
To: [REDACTED]
Cc: [REDACTED]
Subject: FW: Elleray Hall Housing - Floor to Ceiling Heights?

[REDACTED]

Thanks for your reply on the air source heat pumps. We might ask the Design Panel for their thoughts on this.

One other question please. Whilst we are aiming to keep the height of the rear mews down, to minimise any impact to neighbours, we have currently used 2.4m floor to ceiling heights. This exceeded the National Housing Standard of 2.3m. Now reviewing The London Plan 2021, the minimum has changed to 2.5m.

Could you confirm whether this latter dimension needs to be complied with or whether this particular site situation warrants a reduced height.

I promise no more questions. We just want to get it submitted when the client lets us!



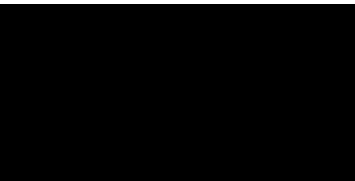
From: [Redacted]
Sent: 22 March 2021 19:16
To: [Redacted]
Subject: Elleray Hall Housing - Floor to Ceiling Heights?



Whilst we are aiming to keep the height of the rear mews down, to minimise any impact to neighbours, we have currently used 2.4m floor to ceiling heights. This exceeded the National Housing Standard of 2.3m. Now reviewing The London Plan 2021, the minimum has changed to 2.5m.

Could you confirm whether this latter dimension needs to be complied with or whether this particular site situation warrants a reduced height.

Best regards



From: [Redacted]
Sent: 22 March 2021 15:21
To: [Redacted]
Subject: Re: Floor to Ceiling Heights?



Virus-free. www.avg.com

From: [REDACTED]
Sent: 31 March 2021 11:54
To: [REDACTED]
Subject: Elleray Hall - flooding update

Official

Flooding update

As outlined in the September pre-application response, the following will be required with any submission:

- A flood risk assessment
- A drainage statement and use of SUDS
- A reduction in surface water discharge to greenfield run-off rates
- Compliance with the London Plan drainage hierarchy

Whilst the above submission deliverables are still required. In September (I was not aware of prior to issuing my letter), the Strategic Flood Risk Assessment was published, and this was later updated in March - [Strategic Flood Risk Assessment - Level 1 \(richmond.gov.uk\)](#) with accompanying interactive maps that can be viewed here - [Strategic Flood Risk Assessment - London Borough of Richmond upon Thames](#). There are a couple of elements that are of relevance, that will need to be addressed in any submission, and therefore deemed it pertinent to identify now:

In my September response, it was identified the site was within Flood Zone 1, a critical drainage area and area susceptible to surface water flooding. In response to the newly published SFRA, the sites is also 75% or more susceptible to groundwater flooding

1. Table 6-1 of the SFRA states, in response to the there being existing floor issues (critical drainage, surface water and ground water flooding), a sequential test needs to be applied. However, this is followed in paragraph 6.2.1, that states, "*The local approach distances that the Sequential Test will not be required if the development proposal is for a residential development or a mix used scheme and within the 800m buffer area identified within the town centre or local centre*".
2. The FRA will need to include a Flood emergency Plan where safe access / egress cannot be achieved and demonstrated as part of the FRA.
3. A Screening study is required to establish if there are any subterranean flood risk issues that may require further investigation.
4. Where the development includes a basement and within an area with greater than 25% susceptible to ground water flooding, a Basement Screening Assessment (BSA) (as a minimum should be carried out). If the BSA identifies any potential issues which would require a more detailed investigation, then a Basement Impact Assessment should be carried out, with borehole information. Whilst I am not aware of the scheme including a basement, it does lower the ground levels, and therefore I am getting clarification from colleagues this matter and will update you shortly.

More information on points 3 and 4 can be found here - [user guide basement assessment.pdf \(richmond.gov.uk\)](#)

The SFRA provides further information regarding the content of site specific FRAs; Statement on SUDS, and Flood Emergency Plans.

[REDACTED]
Serving Richmond and Wandsworth Councils

Tel: [REDACTED]

Email: [REDACTED]

Web: www.richmond.gov.uk / www.wandsworth.gov.uk

This e-mail contains my opinion only that I give without prejudice to any consideration that the Local Planning Authority may give to an application on this site in the future.

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