

# PLANNING STATEMENT

Howson Terrace  
Richmond Hill  
Richmond

# **PLANNING APPLICATION FOR DEMOLITION OF EXISTING BUILDINGS AND ERECTION OF 28NO. AFFORDABLE RETIREMENT APARTMENTS AND ASSOCIATED WORKS**

## **PLANNING STATEMENT**

### **HOWSON TERRACE, RICHMOND HILL, RICHMOND**

#### **ON BEHALF OF HOUSING 21**

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)  
PLANNING AND COMPULSORY PURCHASE ACT 2004**

**Prepared by: Chris Marsh**



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## **1.0 Introduction**

1.1 This Planning Statement accompanies an application for full planning permission for the redevelopment of existing sheltered housing to provide new affordable retirement apartments at Howson Terrace, Richmond Hill.

1.2 The description of development is as follows:

*"Demolition of existing buildings and redevelopment to provide 1 no. building comprising 28 one and two bedroom affordable retirement apartments and communal facilities. Associated external works and landscaping."*

1.3 The purpose of the Planning Statement is to present an assessment of the proposed development against relevant planning policy and other material considerations.

1.4 Sections 2 and 3 provide a description of the site and its surroundings and both the site's and other relevant local planning history. Section 4 sets out the nature of the proposed development. Section 5 summarises pre-application discussions while Section 6 sets out the planning policy and material considerations against which the application is to be assessed, within the wider context of housing need and strategic housing delivery through the planning system.

1.5 Section 7 provides an assessment of the proposed development, organised thematically, dealing first with the principle of residential development of the site, and then considering the impacts in respect of housing and affordable housing, transport, design, amenity, ecology and arboriculture, heritage, flood risk and drainage. Section 8 addresses the legal agreement.

1.6 The Planning Statement will demonstrate that the proposed development complies with an up-to-date development plan and that material considerations also indicate that the proposals should be approved without delay, pursuant to the relevant legislation and national planning policy.

1.7 This Planning Statement should be read in conjunction with the plans and reports submitted with the application as set out in Tables 1 and 2 below:

**Table 1:** List of plans supporting the application:

Plans	Consultant
	Hunters

**Table 2:** List of reports supporting the application:

Report	Consultant
Design and Access Statement	Hunters
Heritage Assessment	Pegasus Group
Transport Assessment	Pegasus Group
Construction Traffic Management Plan	Pegasus Group
Affordable Housing Statement	Pegasus Group
Landscaping Scheme	Pegasus Group
SuDs Strategy	Cole Easdon
Foul Water Drainage Strategy and Infrastructure Services Report	Cole Easdon
Community Engagement Report	SP Broadway
Sustainable Construction Checklist	Hunters
Energy Report	Abbey Consultants
Tree Survey, Constraints Plan and AIA	Barrell Tree Care
Ecological Appraisal, Bat Building Inspection and Badger Survey Results	EPR
Proposed Lighting Strategy	It Does Lighting
Air Quality Assessment	Air Quality Consultants
Daylight Assessment & Lighting Pollution	Hydrock
Health Impact Assessment	Pegasus Group
Townscape Visual Impact Assessment	Pegasus Group

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### **About Housing 21**

- 1.8 Housing 21 is a leading not-for-profit provider of Retirement Housing and Extra Care for older people of modest means. It operates in nearly 200 local authority areas, managing around 20,000 Retirement and Extra Care Living properties and providing over 42,000 hours of social care each week.
- 1.9 The company has a commitment to managing its estate appropriately, undertaking regular review exercises to ensure stock is fit for purpose and investing in improvements – including redevelopment – as warranted.
- 1.10 Further information about Housing 21 can be found on their website using the following link:

[www.housing21.org.uk](http://www.housing21.org.uk)

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## **2.0 The Site and Surroundings**

### **The Site**

- 2.1 The site is located to the southwest of Richmond Hill, occupying a set-back position enclosed to a large extent by mature planting and boundary wall, and accessed via a small car park situated adjacent to the main road. The site is situated immediately northward of Richmond Terrace Gardens.
- 2.2 Howson Terrace comprises 24no. 1-bed sheltered housing units for affordable rent arranged over 3no. buildings, all of which are of two-storey proportions and mid-C20<sup>th</sup> design and are finished in a mixture of brick and concrete.
- 2.3 There is a modest distribution of incidental shared outside amenity space surrounding the buildings, and a modest area for parking/servicing within the northwest part of the site. A number of mature trees sit within and adjacent to the site boundary.
- 2.4 Given the age of the buildings and the standard of accommodation, it has for a number of years been under review by Housing 21 and ultimately determined that the accommodation was no longer fit for purpose.
- 2.5 The existing apartments offer accommodation well below modern space standards, offer no level access as all properties have stepped access. Furthermore, due to their design and construction, the existing buildings do not allow for the installation of lifts. Occupiers have been decanted to other Housing 21 properties. All but two of the units are now vacant.
- 2.6 The site is located within Flood Zone 1, indicating the lowest risk of flooding, and is not subject of any other specific civil, ecological or landscape designations.

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### **Local Area**

- 2.7 The site sits within the Richmond Hill Conservation Area, a distinctive and well-defined area containing a variety of building types and mix of uses such as residential, commercial, educational, institutional and important public open space.
- 2.8 The site also falls within the northern limits of the Terrace and Buccleuch Gardens Grade II-listed park and garden, which extends some considerable distance to the South and includes within its boundary a Grade II-listed statue and buildings at Langholm Lodge.
- 2.9 The character of the surrounding area is therefore strongly informed by its historic form, derived chiefly from C18<sup>th</sup> development, in the context of which the buildings at Howson Terrace, together with the nearby Bromwich House, are a relatively late intervention.
- 2.10 The site is situated approximately 450m south of Richmond-on-Thames town centre, with its associated retail, leisure and transport facilities. The nearest bus stops are within 80m of the site at Robins Court, providing frequent services to Kingston via the 65 and N65 services.
- 2.11 Richmond rail and underground station is located 850m directly north of the site, providing rail services to Reading and London Waterloo, tube connection via the District Line and overground links to Ealing Broadway/ Upminster and Stratford.
- 2.12 There is also access from the site to pedestrian and cycle facilities at Richmond Hill and the adjacent Terrace Gardens, with onward connectivity to the Richmond River Thames Towpath, which is a popular route for movement on foot or by cycle.



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### 3.0 Planning History

3.1 A search of the Council's online planning register identifies the following planning history in respect of the application site:

3.2 **99/2731** - *Installation Of New Upvc Window To Side Elevation At Ground And First Floor Flats (19 and 23 Howson Terrace)* – Approved, subject to conditions.

This application sought straightforward replacements of dilapidated glazing units within their original openings on a like-for-like basis at ground and first floor levels, and was granted planning permission subject only to a standard time condition.

3.3 **92/2074/FUL** - *Provision Of Additional 2 No Car Parking Spaces On Land Currently Used As Garden* – Approved, subject to conditions.

This application sought the extension of the existing access/parking hard standing to create an additional 2no. parking spaces to aid the servicing of accommodation. The application was approved subject only to a standard time condition.

3.4 Aside from a number of tree works applications in the vicinity of the site, relevant planning applications are otherwise limited to comparatively minor works to nearby low-rise apartment blocks, including a live application in respect of works to the neighbouring Bromwich House (**20/2474/HOT**).

3.5 The principle of wholesale demolition and replacement has not therefore been tested to date in this location, notwithstanding the two separate rounds of pre-application advice undertaken in respect of this site, details of which are set out in Section 5 of this Statement.

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## **4.0 Proposed Development**

4.1 The proposed development is for:

*"Demolition of existing buildings and erection of a building containing 28no. affordable retirement apartments, car parking and associated landscaping."*

4.2 The main features of the proposals can be summarised as:

- Demolition of the three buildings currently on site;
- Erection of a consolidated block of 28no. apartments;
- Accompanying infrastructure and hard landscaping (including car parking);
- Soft landscaping to include new tree and vegetation planting;
- Reconfiguration of parking areas, to include provision of active and passive EV charging points; and
- Incidental improvements to main access from Richmond Hill.

4.3 The proposed site plan presents the proposed configuration of the new units, which are to be arranged as a crescent orientated north-south following the site contours and tree constraints/opportunities.

4.4 Access is to be retained in much its present arrangement, with an area to the East of the new accommodation to be refurbished to provide 11no. parking spaces for residents, three of which disabled bays. Of these, 2no. spaces are to be fully equipped with EV charging facilities, while a further 2no. will be passively provided (i.e. with all supporting infrastructure) in this respect.

4.5 The accommodation is to consist of 28no. retirement apartments – a net gain of 4no. units – mostly comprising 1-bedroom units with private balconies. The units are to be offered as 100% affordable, with the following tenure mix:

Size	Tenure	No.
1-bed	Social Rented	22
1-bed	Shared Ownership	3
2-bed	Shared Ownership	3
<b>TOTAL</b>		<b>28</b>

**Table 3: Proposed Accommodation Mix**

- 4.6 Commensurate with the specialised nature of the accommodation, the proposed building is also to incorporate communal lounge facilities with WC's, incidental seating/meeting areas, service and bin storage areas and lift access.
- 4.7 Externally, the building is to consist of a varied form intended to break up its apparent overall massing, further aided by its part-subterranean lower ground floor and diminishing scale approaching the more sensitive southern aspect. Following the topography and surrounding built form, the building will reduce from four storeys to three from North to South.
- 4.8 Facing materials comprise predominantly yellow multi-stock brick with blue engineering brick detailing interspersed with structural glazing, while exposed upper wall sections are to be detailed as green walls, with the majority of the roof covering to be similarly treated.

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## 5.0 Pre-Application Consultation

### Local Planning Authority

- 5.1 The Local Planning Authority originally provided pre-application advice in relation to the prospective redevelopment of the application site in March 2017, at which time the indicative proposals presented by the applicant comprised 41 no. units over 3-6 storeys (one of which was a lower ground floor) including sub-terranean car parking.
- 5.2 The block took a rectangular form with storey heights reduced in certain places and upper floors set back to take account of the more visually sensitive parts of the site.
- 5.3 The commentary received from officers broadly indicated that, while the principle of development was supported, the intensity of development – with its associated built form, activity and parking requirements – was considered to be excessive in relation to the site, taking into account the various constraints. A full copy of the Council's advice is attached at **Appendix 1**.

### **APPENDIX 1: COUNCIL PRE-APPLICATION ADVICE 27 MARCH 2017**

- 5.4 Following earlier feedback, a further formal pre-application enquiry was submitted to the Council on 31 March 2020 presenting proposals for a revised scheme with a reduced quantum of 30no. apartments configured in a 'crescent' formation and supported by a detailed Design Document.
- 5.5 The Design Document explained the principal changes when comparing the previous scheme and the pre-app scheme. Aside from the form and reduced massing of the building, with reductions in both footprint and scale, the sub-terranean basement car park was omitted and replaced with surface level car parking in the interests of tree protection.

- 5.6 In the course of the Council's pre-application response, officers were supportive of the more 'organic' design of the proposed replacement building but remained concerned in respect of its scale (up to five storeys) in relation to heritage and other receptors. A copy of this letter is attached at **Appendix 2**.

#### **APPENDIX 2: COUNCIL PRE-APPLICATION ADVICE 30 JUNE 2020**

- 5.7 Officers reviewing the draft proposals acknowledged the design improvements to the scheme and, while reviewing a number of other technical issues, reiterated residual concerns regarding the bulk, height and scale of the proposed replacement building. Officers therefore advocated a careful balance between finding an appropriate layout and density for the site, the relationship and separation between neighbouring buildings, the provision of sufficient landscaping, planting and residential amenity space and parking and servicing.

#### **Public Consultation**

- 5.8 The accompanying Community Engagement Report, prepared by SP Broadway, details the methodology adopted in the lead-up to the planning application in respect of engaging neighbours and key stakeholders in the emerging proposals, enabling feedback to be gathered and addressed in the course of submission.

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## 6.0 Planning Policy and Guidance

6.1 In this section the national and local planning policy and guidance pertinent to the application site and development proposals is summarised. The plan-led approach to development, as set out by Section 38 (6) of the Planning and Compulsory Purchase Act 2004, requires development proposals to accord with the adopted Development Plan unless material considerations indicate otherwise.

### **The Development Plan**

6.2 For the purposes of this application, the Development Plan comprises the London Borough of Richmond upon Thames Local Plan, adopted July 2018 and (following a legal challenge) March 2020, together with the policies of the London Plan, published March 2021.

6.3 The policies of relevance to this application comprise:

#### Local Plan

- LP1 – Local Character and Design Quality
- LP2 – Building Heights
- LP3 – Designated Heritage Asset
- LP5 – Views and Vistas
- LP7 – Archaeology
- LP8 – Amenity and Living Conditions
- LP16 – Trees, Woodlands and Landscape
- LP17 – Green Roofs and Walls
- LP20 – Climate Change Adaption
- LP21 – Flood Risk and Sustainable Drainage
- LP22 – Sustainable Design and Construction
- LP30 – Health and Wellbeing
- LP34 – New Housing
- LP35 – Housing Mix and Standards

- LP36 – Affordable Housing
- LP37 – Housing Needs of Different Groups
- LP38 – Loss of Housing
- LP44 – Sustainable Travel Choices
- LP45 – Parking Standards and Servicing

6.4 Taking account of the content of the pre-application advice received to date, the most pertinent policies are:

*LP37 – Housing Needs of Different Groups*

6.5 The loss of existing housing will be resisted where it meets identified specific community needs; unless it is no longer needed; or that the existing accommodation will be re-provided to an equivalent or greater standard; or that the new accommodation will be another identified priority need.

6.6 In addition, planning permission will be granted for new accommodation where housing is providing for an identified local need across a range of tenures, providing they are on site and in a location suitable for that particular use.

*LP35 – Housing Mix and Standards*

6.7 This requires development to meet Nationally Described Space Standards, along with adequate external space. Well-designed positioned balconies or terraces are encouraged where new residential units are on the upper floors, provided that they comply with Policy LP8 Amenity and Living Conditions.

6.8 The policy also requires 90% of housing to be 'accessible and acceptable dwellings' and 10% to meet Building Regulation M4(3) 'wheelchair user dwellings'.

*LP36 – Affordable Housing*

6.9 This policy confirms that the Council accepts 50% of all housing units to be

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affordable and of that 50%, 40% will be for rent, and the remaining 10% in shared ownership.

LP8 – Amenity and Living Conditions

- 6.10 This policy requires good standards of design to ensure that the amenity of existing and prospective occupiers is protected into the future.

LP5 – Views and Vistas

- 6.11 The Council will protect the quality of the views, vistas, gaps and the skyline, all of which contribute significantly to the character, distinctiveness and quality of the local and wider area.

LP3 – Designated Heritage Assets

- 6.12 This is a detailed policy requiring developments to preserve and where possible enhance designated heritage assets.

London Plan

- 6.13 Following extensive public hearings and subsequent modifications including a direction issued by the housing secretary preventing the publication of the new London Plan until "*inconsistencies with national policy and missed opportunities to increase housing delivery*" were rectified, the new London Plan was published in March 2021.

- 6.14 **Policy H13 – Specialist Older Persons Housing** - states that Boroughs should work positively and collaboratively with providers to identify sites which may be suitable for specialist older persons housing taking account of (inter alia):

*1) local housing needs information including data on the local type and tenure of demand, and the indicative benchmarks set out in Table 4.3*



*2) the need for sites to be well-connected in terms of contributing to an inclusive neighbourhood, having access to relevant facilities, social infrastructure and health care, and being well served by public transport*

*3) the increasing need for accommodation suitable for people with dementia.*

*Specialist older persons housing provision should deliver:*

*1) affordable housing in accordance with Policy H4 Delivering affordable housing, and Policy H5 Threshold approach to applications*

*2) accessible housing in accordance with Policy D7 Accessible housing*

*3) the highest standards of accessible and inclusive design in accordance with Policy D5 Inclusive design*

*4) suitable levels of safe storage and charging facilities for residents' mobility scooters*

*5) pick up and drop off facilities close to the principal entrance suitable for taxis (with appropriate kerbs), minibuses and ambulances.*

6.15 Table 4.3 indicates an annual borough benchmark for specialist older persons housing within Richmond of 155 units per annum for the period 2017-2029, not far above the median figure amongst the London boroughs and indicative of a significant ongoing need for specialised accommodation.

6.16 Although omitting previous references to the Use Classes Order (as amended), the policy emphasises its express requirements for 'specialist older person housing' and that it does not apply to accommodation that is considered 'care home accommodation' (including end of life/hospice care and dementia care home accommodation) falling within Use Class C2.

- 6.17 The supporting text at Paragraph 4.13.5 states that *"Specialist older persons housing that does not provide an element of care but is specifically designed and managed for older people (minimum age of 55 years) is covered by the requirements of this policy."*

### **Material Considerations**

#### National Planning Policy Framework

- 6.18 The National Planning Policy Framework was last updated in July 2021. The provisions of the revised Framework maintain the presumption in favour of "sustainable development", the definition and interpretation of which in respect of the proposed development is highlighted below.

- 6.19 As set out at **Para. 8**, *"Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):*

*a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*

*b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed, beautiful and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*

*c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land,*

*helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."*

6.20 **Paragraph 60** of the Framework sets out the Government's objective of significantly boosting the supply of home, with **Paragraph 62** identifying that:

*"Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes)."*

6.21 **Paragraph 120 (d)** of the Framework states, *inter alia*, that planning decisions should *"promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively..."*

#### Other material considerations

6.22 Other material considerations that may be relevant to the determination of the application include:

- Buildings of Townscape Merit (2015)
- Residential Development Standards (2010)
- Affordable Housing (2014)
- Sustainable Construction Checklist Guidance Document (2016)
- Design Quality (2006)
- Transport (2020)
- Refuse and Recycling Storage Requirements (2015)
- Small and Medium Housing Sites (2006)
- Planning Obligations SPD (2020)

- Air Quality (2020)
- Development Control for Noise Generating and Noise Sensitive Development (2018)
- Richmond and Richmond Hill Village Plan (2016)
- Retirement Housing Review (2016)
- National Planning Practice Guidance (PPG)

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## 7.0 Planning Assessment

7.1 This section provides an assessment of the proposals against the relevant planning policy and material considerations, with emphasis on the three dimensions of sustainable development identified in the NPPF – economic, social and environmental.

### Principle of Development

7.2 The operative policy concerning the principle of development is Policy LP37, further guided by the content of London Plan Policy H13. The former establishes that this is an appropriate type of new housing in the context of Policy LP34, which sets out the overall need for new housing and acknowledges that much of the borough is constrained by large areas of protected open land, flood risk areas and heritage designations.

7.3 The loss of the existing sheltered housing apartments on this site is justified in this instance by the re-provision of an increased number of fit-for-purpose units, when having regard to the provisions of Policy LP37, which states:

*"The loss of existing housing will be resisted where it meets identified specific community needs, unless it can be shown that:*

- *the accommodation is no longer needed, or*
- *that the existing accommodation will be adequately re-provided to an equivalent or greater standard in a different way or elsewhere, or*
- *the new accommodation will instead meet another identified priority local need."*

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- 7.4 Notwithstanding its current vacancy, the applicant does not suggest the existing sheltered housing is no longer needed, pursuant to the first bullet point. However, the successful decant of occupiers to alternative premises in the local area demonstrates that this has been re-provided (and to a considerably greater standard) already.
- 7.5 Critically, having regard to the third bullet point, the new accommodation will meet another identified priority local need, that of affordable specialised older persons' housing, which both the Council's Retirement Housing Review and the New London Plan identify as a crucial and ongoing requirement in the context of an ageing, and increasingly stratified, population.
- 7.6 Paragraph B of LP37 states *"Planning permission will be granted for new accommodation where housing is providing for an identified local need, across a range of tenures, providing they are on a site and in a location suitable for that particular use, and in accordance with environmental, transport, parking and other relevant policies."*
- 7.7 While the technical matters outlined are addressed later in this Statement and through the associated reports, the proposals will provide new accommodation for an identified local need and a range of tenures on a suitable site and in a suitable location. The proposals therefore accord in principle with the policy, as outlined by officers in the initial pre-application advice received.
- 7.8 In the first instance, it is also relevant that the application is to be considered in the context of Paragraph ID 016 Reference ID: 63-016-20190626 of the PPG (*What factors should decision makers consider when assessing planning applications for specialist housing for older people?*), which states, *inter alia*:
- "Local planning authorities can encourage the development of more affordable models and make use of products like shared ownership. Where there is an identified unmet need for specialist housing, local authorities should take a positive approach to schemes that propose to address this need."*

7.9 In this case there is an identified unmet need for specialist housing for older people – see Table 4.3 of the London Plan – and the proposals should therefore be treated in an expressly positive manner, over and above the presumption in favour of sustainable development as set out in the Framework. This is the starting point for the consideration of the application.

#### Housing Mix

7.10 Having regard to the relevant definitions contained in Annex 2 to the Framework, the scheme comprises 100% affordable housing consisting predominantly of social rented units with a small proportion (approximately 21%) shared ownership. This tenure split is entirely consistent with the preferred 4:1 ratio directed by Policy LP36.

7.11 As Policy LP36 directs that *at least* 50% of new housing should be affordable, the proposals meet and exceed the requirements of the development plan in this respect; with all due deference to the existing (albeit unoccupied) 24no. social rented units on the site, the over-provision of affordable units in this instance is a pronounced benefit of development to be weighed accordingly in the planning balance.

7.12 In practice, the proposed units will be managed centrally and tenure-blind so far as the occupation of the apartments is concerned. The provision of a small portion of slightly larger 2-bed units will dually both make better use of the space enabled by the building's form and also achieve a greater degree of choice, which may support – for instance – the facility for longer term live-in care so that occupiers do not have to relocate.

7.13 The generally smaller size of the proposed units associated with the proposed specialist older persons' housing is also justified under Policy LP34, which while seeking mostly family-sized new housing, acknowledges that certain forms of accommodation do not readily fit this model. The size of the units also of course means a greater contribution to the Council's need for such accommodation can be met on site.

Amenity and Space Standards

7.14 The proposals have evolved to take account of the site constraints and opportunities, while ensure the proposed accommodation remains fit-for-purpose and policy compliant in respect of its size, configuration and amenity. In the first instance, it is confirmed that all units meet the Nationally Described Space Standards, pursuant to Policies LP35(B) of the Local Plan and D6 of the London Plan. For ease of comparison, this is shown below:

Unit Type	NDSS Minimum	Proposed Size	+/-
1B2P apartment	50sqm (+1.5sqm fitted storage)	55.9sqm	+ 4.4m
2B3P apartment	61sqm (+2sqm fitted storage)	67.8sqm	+ 4.8 sqm

**Table 3: Comparison against Nationally Described Space Standards**

7.15 In respect of external amenity space, each unit will benefit from private dual balconies, accessible via the main living accommodation to each apartment. Policy D6(9) states that *"Where there are no higher local standards in the borough Development Plan Documents, a minimum of 5 sq.m. of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sq.m. should be provided for each additional occupant, and it must achieve a minimum depth and width of 1.5m."*

7.16 The development meets and exceeds these standards, assuming an occupation of up to 2no. persons for the one-bed apartments and a potential 3no. persons (e.g. couple and live-in carer) for the two-bed units. This provision is of course in addition to the generous incidental soft landscaping into which the development is to be incorporated, and to which residents will have unfettered access.



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- 7.17 It can also be confirmed, pursuant to LP35(E), that all new units will meet the Building Regulations M4(2) standard for adaptability, and 10% will go beyond M4(2) and achieve the optional M4(3) wheelchair accessibility standard, ensuring a range of choice and protection against future changes in circumstances to allow occupiers a greater chance to remain in their own homes.
- 7.18 In terms of the qualitative assessment of amenity provision for incoming residents, the comparatively low-density nature of the development due to site constraints combined with its situation within the registered park and garden will achieve a very high standard of aspect and enjoyment, with desirable views from the habitable rooms of the building and an environment free from undue noise and disturbance, including light pollution.
- 7.19 Outside private amenity areas also meet the criteria of Policy LP35(D) (a-d) – with (e) not being relevant in this instance – in terms of their specification and functioning. Collectively, they will have access to direct sunlight through almost all of the day, while the building's orientation, form and detailing will create shaded and enclosed external areas that may also be utilised by occupiers.
- 7.20 Due to the orientation of the building and its considerable separation from neighbouring occupiers, the proposals will also preserve privacy for new and existing residents, while the scale and separation of the building will further minimise any perception of overbearing. The supporting daylight/sunlight assessment demonstrates that loss of light is similarly not a critical issue in this instance.
- 7.21 Having regard to the above considerations, the proposals comply with the requirements of Policy LP8 and the residential design guidance in that they will create a high standard of amenity for incoming occupiers while protecting the living conditions of existing neighbours.

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Highways and Transport

- 7.22 The accompanying Transport Assessment, prepared by Pegasus Group, considers the transport and highways implications of the proposals in terms of trip generation, on site provision and the local context, demonstrating that this is a highly sustainable location for the proposed development benefiting from a range of non-car travel modes.
- 7.23 As set out in the Assessment, the nature of the proposed development is that its estimated additional trip-generating capacity is reasonably low, particularly in comparison to the established use of the site, and it should also be noted that journeys made from developments of this type are typically over shorter distances and generally within the immediate surrounding area. Accordingly, it is not considered that the proposals will have any significant adverse impact on the local highway network and in particular will not breach the 'severe' threshold for such impacts as set out at Paragraph 111 of the Framework.
- 7.24 Pursuant to the objectives of Policy LP44, the development would enable use of a range of sustainable transport modes, including walking, cycling and public transport including rail, bus and water, all of which are in comfortable distance of the site. High quality amenities are available in the immediate vicinity for recreational and day-to-day use, including Richmond high street and the open spaces of the Thames Towpath, Richmond Terrace Gardens and Richmond Park.
- 7.25 The existing site access has been reassessed for the purposes of the application and is deemed to be adequate in highway safety terms, while the provision of a policy-compliant level of on-site parking in accordance with Policy LP45 will guard against the overflow of private vehicles to the surrounding roads; these are subject of strict parking controls in any case.
- 7.26 Turning to the specific requirements of the development in question, the ground floor servicing areas will allow for the safe and convenient storage of mobility vehicles and the like, preventing ad-hoc storage of these around and within the building.

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Design, Townscape and Visual Impact

- 7.27 The accompanying Design and Access Statement, produced by Hunters, sets out the background to the evolution to the scheme including initial site assessment, functional requirements and preliminary feasibility, through to the pre-application engagement and iterative development of the proposals. It provides an account of how the submission scheme has been informed, having due regard to the numerous constraints and opportunities presented by the site.
- 7.28 This document sets out in greater detail how the resulting scheme delivers independently the high standard of design advocated by local policies LP1 and LP2, London Plan policies D3, D4 and D6, and Section 12 of the updated National Planning Policy Framework. Notwithstanding the detracting influence of the existing buildings on site, therefore, the proposals will create an immediate enhancement when in situ.
- 7.29 Turning to the impacts of the development on the surrounding area, the accompanying Townscape Visual Impact Assessment, prepared by Pegasus Group, provides a detailed study on the proposals' wider visibility and influence on the visual amenity and characteristics of the locality. Briefly, in terms of wider views the site remains relatively contained, however there are some closer glimpsed and seasonal public views in which parts of the building are revealed; it is in part for this reason that individual design details have been given particular attention.
- 7.30 As shown through the accompanying documents, the proposals have been strongly informed by a firm understanding of the visibility, character and appearance of the site and its surroundings, resulting in a final form that is complimentary and beneficial to the area in its design. As such, the proposals respond positively in respect of the objectives of local design policies, supported by the relevant local design guidance.

7.31 Paragraph 134(a) of the Framework directs, *inter alia*, that in decision-making "significant weight should be given to... development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes."

7.32 Accordingly, significant weight should be ascribed in the planning balance to the design credentials of the proposed replacement building and its wider contribution to the character, appearance and quality of the surrounding built environment.

#### Built Heritage

7.33 In setting the context outlined above, heritage assets play a critical role and have been assessed in depth through the accompanying Heritage Assessment, prepared by Pegasus Group. This document systematically assesses the significance of respective assets, including non-designated assets, utilising a range of appropriate sources while generating a clear understanding of their settings and potential sensitivities to new development.

7.34 The Assessment considers the heritage impacts of the proposed development, including the demolition of the existing blocks that have occupied the site since 1971, in respect of these receptors both individually and cumulatively to determine any quantify any harms – be these substantial or less than substantial – or benefits arising. Rather than reiterate the detailed content of the assessment, these conclusions are briefly summarised in the table below:

**Table 5: Summary of Built Heritage Impacts**

<b>Receptor</b>	<b>Type</b>	<b>Significance</b>	<b>Impact</b>
Terrace and Buccleuch Gardens	Registered Park and Garden (Grade II*)	Derived from historic plan, planting, historic interest and wider setting with historic views and interlocking Thames landscapes.	Limited less than substantial harm
Richmond Hill Conservation Area	Conservation Area	Character and appearance derived from landscape and river setting and buildings individually and in groups.	Limited less than substantial harm

7.35 It should be noted that the existing 1970s buildings on site are judged to be of no historic interest or merit, and upon their introduction in place of the demolished Cardigan House a significant detractor to the significance of immediate heritage receptors, in particular the registered park and garden in which they are situated. Their removal is a heritage benefit of development in and of itself.

7.36 Notwithstanding, the mechanism provided by Section 16 of the Framework as interpreted by prevailing case law directs that any harm arising must be assessed individually, particularly where the respective operations (demolition and replacement) are discretely separate. In this regard, the above table indicates that the level of harm arising across all relevant built heritage receptors registers at the lowermost end of the spectrum of 'less than

substantial'.

- 7.37 In the light of the degree of harm identified, which is judged to be at the lowest end of the spectrum of 'less than substantial', Paragraph 202 of the Framework directs that this harm should be weighed against the public benefits of the proposal. It is important that the level of harm is accurately weighed in this balance, against the public benefits of development which include, *inter alia*, the provision of additional specialised affordable housing, energy efficiency, aesthetic improvements and habitat enhancement.

#### Archaeology

- 7.38 The site is located within an Area of Archaeological Potential which covers Richmond. The landscaping and construction of the existing development within the site is likely to have disturbed or removed any earlier remains in these areas, as indeed may have earlier engineering works associated with the estates formerly occupying the site.
- 7.39 Policy LP7 is consistent with the Framework and states, *inter alia*, that "*Desk based assessments and, where necessary, archaeological field evaluation will be required before development proposals are determined, where development is proposed on sites of archaeological significance or potential significance.*" In this instance, the desk-based assessment undertaken by Pegasus Group has identified that the overall potential for archaeological resources to be affected by the development, is low to very low.
- 7.40 In the light of the above, further survey work is not deemed reasonably necessary in this case. Notwithstanding, the applicant would be amenable to a precautionary planning condition enabling the proper examination, recording and further investigation of any unexpected below-ground archaeology encountered in the course of demolition and/or construction works.

#### Trees

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- 7.41 The site has been subject of a recent tree survey, prepared by Barrell Tree Care and submitted with the application, which gives an account of the present distribution, species and condition of trees present on site and within its immediate environs. Policy LP16 seeks to protect existing trees and the provision of new trees, shrubs and other vegetation of landscape significance, and the function of such in the context of the Gardens as a whole is fully understood.
- 7.42 As officers will be aware, tree constraints have been a significant consideration through the evolution of the proposals through the two separate rounds of pre-application advice and their proactive incorporation into the overall form of the development has been a driving factor in informing the scheme to its present form.
- 7.43 The submitted Arboricultural Impact Assessment details the anticipated effects of the development on existing arboricultural resources and identifies suitable measures for the protection of trees through the demolition, construction and operational phases of development. Through appropriate measures, the proposals will integrate with the existing tree cover without causing undue pressure for removal or reduction.
- 7.44 As such, the proposals satisfy the policy objectives of local policy LP16 and G7(C) of the London Plan, together with the general aspirations of the updated Framework and National Design Guidance. In the longer term, trees on site benefit from protection by virtue of their designated location and will continue to serve as a valued amenity, ecological, health and townscape resource.

#### Ecology

- 7.45 The accompanying ecological report, prepared by EPR, has undertaken a preliminary appraisal of the site in biodiversity and habitat terms, taking account of the earlier pre-application advice provided in this respect and informing the final form, design and landscaping of the proposed development as set out in the accompanying drawings.

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- 7.46 Preliminary work also identified the need for further Phase 2 bat surveys, which have been duly carried out over the course of the May-September survey season in line with the published guidance. Based on the results of these surveys, a number of key mitigation, compensation and enhancement measures have been incorporated into the proposals.
- 7.47 In the first instance, these are to include the retention of open commuting/foraging routes with the wider Terrace Gardens, protection of trees and dark margins to the site, while active measures including bat and hedgehog boxes and the delivery of a suitable lighting strategy as detailed in the accompanying reports are to be employed in the interests of ecological protection and enhancement pursuant to Policy LP15.
- 7.48 Additionally, it is intended that demolition and construction phase impacts - including noise, dust, lighting, etc - are managed through the submission and agreement of a Construction Environmental Management Plan (CEMP) to be secured by planning condition, in order to ensure the protection of species prior to the operational phase of development.
- 7.49 The report also assesses the potential for Biodiversity Net Gain (BNG) on site. While not yet a statutory requirement, development proposals should seek to deliver this in accordance with Policy G6(D) of the London Plan and therefore opportunities will be taken wherever practicable to deliver this on site through the proposals.

#### Drainage

- 7.50 The accompanying Surface Water and SUDS Drainage Strategy, prepared by Cole Easdon, details how the site currently drains through a managed system understood to discharge to the sewer at Petersham Road and will be developed with a significant increase in active management to achieve a net reduction in offsite surface water discharge.
- 7.51 In accordance with sustainable drainage principles and relevant local policy,



the proposed system provides for attenuation features including green roofs and cellular tanks limiting the discharge rate to equivalent of the 100yr greenfield rate and a maximum 2.7l/s, equating to a betterment of between 67 and 89% over the current runoff situation. This has been confirmed as within capacity by Thames Water's infrastructure.

- 7.52 In the event of system overloading or failure, exceedance routes are demonstrated, relying on the extensive surrounding green space. As it is considerably elevated above the river and within Flood Zone 1, there is no substantially increased risk of flooding at the site itself in such an event.
- 7.53 Consequently, the new development will not increase surface water runoff and will not increase flood risk in the local area. The drainage proposals as presented meet London Plan policy objectives in delivering SuDS, as at SI13, and Local Plan policy LP21.

#### Energy and Sustainability

- 7.54 In the first instance, it must be recognised that in terms of energy use and efficiency, the existing buildings occupying the site perform very poorly, with interventions since their construction in the early 1970s limited to the replacement of glazing and minor fittings. Indeed, the extent of works required to refurbish the existing buildings to even a basic Building Regulations standard in this respect alone is likely unviable in of itself.
- 7.55 Policy LP 22 requires that developments "*achieve the highest standards of sustainable design and construction to mitigate the likely effects of climate change*" through a combination of construction, energy, heat and water efficiency measures, which should be demonstrated through suitable reporting in the course of applications. The policy should be read with the specific requirements outlined at policies SI 2, SI 4 and SI 5 of the London Plan.
- 7.56 The accompanying Energy Statement, prepared by Abbey Consultants, demonstrates how a 'fabric first' approach has informed the evolution of the

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proposals, including passive measures such as building orientation, mixed ventilation and balcony shading, together with the specification of energy-efficient building materials and methods to conserve and reduce the demand for energy during the operational phase.

7.57 In line with the London Plan Policy SI 3 the development has been screened in respect of Heat Network Priority Areas and using the Heat Map tool it can be confirmed that there are no existing, or proposed, district heating networks to which a connection is technically feasible. Accordingly, the proposed heating strategy comprises a mixture of hot water heat pump cylinders and air-source heat pumps for the residential and non-residential elements respectively.

7.58 Likewise, options for renewable energy have been investigated however, aside from the use of air source heat pumps, most are either technically unfeasible or in conflict with other design priorities; for instance, the use of solar PV would detract from the building's compatibility with its surroundings and also cause friction with the use of green roofs as promoted by other policies.

7.59 Overall, the report demonstrates that a saving against basic legal requirements of 14% is achievable, following the energy hierarchy. Not only does this represent a compliant position in relation to the relevant Development Plan and national policies, it also represents a considerable betterment relative to the existing situation and thus should be weighed independently in the planning balance as such.

#### Planning Balance

7.60 Having regard to the above considerations, this Statement has demonstrated the proposals' compliance with relevant local and national planning policies. Notwithstanding, it is necessary to consider the benefits and harms of the development, together with the respective weight to be ascribed to these, in arriving at a reasonable planning balance in respect of the proposals.

7.61 These are therefore summarised below in the context of the three overarching objectives of sustainable development as set out in the Framework; economic, social and environmental.

**Table 3: Summary of benefits**

Objective	Consideration	Weight
Economic	Construction employment	Substantial Benefit
	Local spend once occupied	Significant Benefit
Social	Delivery of specialist affordable housing to meet identified need	Substantial Benefit
	Re-use of unoccupied, non-secured site	Significant Benefit
	High-quality accommodation and amenity/open space	Moderate Benefit
Environmental	On-Site Biodiversity Net Gain	Significant Benefit
	Improved energy performance	Significant Benefit
	Demolition of poor-quality buildings and visual betterment	Moderate Benefit

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- 7.62 For the reasons set out in this Statement, the proposals comply with the development plan when read as a whole. Weighing additionally in favour of granting permission for the proposed development are the numerous material benefits outlined in the table above, including the substantial benefits associated with delivering a net gain in specialised affordable housing contributing toward meeting an identified local need.
- 7.63 Matters discussed in this Statement and the accompanying reports concerning transport, drainage, archaeology and arboriculture weigh neither positively nor negatively in respect of the planning balance. They are nonetheless contributory factors indicating the proposals' compliance with relevant policy considerations in their specific respects.
- 7.64 Although built heritage as a matter for consideration has been reconciled through the mechanisms provided by relevant planning policy, the very limited less than substantial harm identified in respect of nearby receptors is nonetheless an adverse impact of development that must be weighed in the planning balance. This exercise should take account of the site's current condition and the benefits associated with the removal of existing buildings in this historic context.
- 7.65 This Statement has demonstrated the proposals' compliance with the Development Plan read as a whole. Having regard to Paragraph 11(c) of the Framework and duly to other material considerations as relevant, the proposals represent sustainable development that should therefore be approved without delay.

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## **8.0 Planning Contributions**

### Section 106 Agreement

8.1 The Community Infrastructure Levy Regulations 2010 (as amended) make clear at Regulation 122 that any additional Section 106 requirements must be:

- Necessary to make the development acceptable in planning terms; and
- Directly related to the development; and
- Fairly and reasonably related in scale and kind to the development.

8.2 The applicant proposes that the following Heads of Terms are pursued in respect of matters to be secured by S106 agreement:

- Apartments to be provided on a 100% affordable basis, with retained nominations to the Borough Council as appropriate; and
- Age restriction to over-55's on all apartments.

### Community Infrastructure Levy (CIL)

8.3 The London Borough of Richmond introduced its Community Infrastructure Levy (CIL) charging schedule in November 2014, while the Mayor of London introduced a CIL charge from April 2012, updating the charging schedule in April 2019. The relevant CIL forms are submitted with the application.

8.4 In this instance, regardless of any substantial offset against the floor space to be lost through demolition, it is anticipated that the scheme in totality will benefit from social housing relief in respect of CIL charging.

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## **9.0 Conclusions**

- 9.1 The application seeks full planning permission for the demolition of existing flats and the erection of 28no. affordable retirement apartments and associated works at Howson Terrace, Richmond Hill.
- 9.2 The proposals address an identified local housing need, demonstrate proactive engagement with key stakeholders and will promptly deliver a high quality and sustainable development.
- 9.3 This Statement has addressed the relevant policy and material considerations as pertinent to the proposals, demonstrating how the development accords with the Development Plan and national planning policy and guidance.
- 9.4 Additionally, the proposals will deliver quantifiable benefits weighing in favour of the development including, but not limited to:
- Delivery of affordable housing reflecting identified local need;
  - New occupants bringing local spend and supporting local services;
  - A more effective use of land and improvement to the appearance of the site;
  - Betterment to surface water runoff rates and reduction in flood risk;
  - Provision of enhanced landscaping and ecological enhancement; and
  - Improved pedestrian/cycle provision through the site and surrounding area.
- 9.5 Having regard to all relevant policy, material and statutory considerations, it is therefore requested that the application for sustainable development is approved without delay.

**APPENDIX 1**  
**COUNCIL PRE-APPLICATION ADVICE 27 MARCH 2017**

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27 March 2017

Dear Mr Zanardo

**Town and Country Planning Act 1990 (as amended)**  
**Howson Terrace, Richmond Hill**

Thank you for your pre-application submission for the redevelopment of Howson Terrace received on 13 January 2017, I apologise for the delay in this written response.

It is understood that the proposal involves the demolition of the existing buildings (comprising three, 2-storey blocks of 24 flats) and redevelopment to provide Category 1 retirement housing for those aged 65 and above within a building ranging from 3 to 6 storeys in height.

This pre application submission follows initial conversations with officers where a concern was raised with regard to size, height and mass. The principal issues relevant to your proposal have been summarised below and as set out in our meeting of 23 February 2017.

Policy context

At the Cabinet meeting of 13 December 2016 the Publication version of the Council's updated Local Plan was agreed for public consultation between 4 January and 15 February 2017 and it was also agreed that the policies would be adopted and used for development management purposes immediately. Therefore, the existing Core Strategy and Development Management Policies as well as the emerging Local Plan policies will need consideration.

As set out in the meeting, I do not intend to duplicate a large swathe of the text within local policies within this letter although I have set out below the policies I consider relevant (and may not be exhaustive) to the development sought and site constraints. These are set out on Richmond's website and should be self-explanatory in how they relate to this development.



*The London Borough of Richmond upon Thames Core Strategy:*  
CP1, CP2, CP3, CP4, CP5, CP7, CP10, CP14, CP15.

*The London Borough of Richmond upon Thames Local Plan:*  
DM SD1, DM SD2, DM SD4, DM SD5, DM SD7, DM OS2, DM OS4, DM OS5, DM OS6, DM OS11, DM HD1, DM HD3, DM HD4, DM HD7, DM HO5, DM HO6, DM TP2, , DM TP8, DM DC1, DM DC4, DM DC5, DM DC6.

*The London Borough of Richmond upon Thames Publication Local Plan:*

LP1, LP3, LP4, LP5, LP7, LP8, LP12, LP13, LP15, LP16, LP17, LP18, LP20, LP22, LP34, LP35, LP36, LP37, LP38, LP44, LP45.

### Land Use

In principle the case for remodelling of sheltered housing by a Registered Provider can be supported, provided an application sets out full justification as set out in policies DMHO5 and LP37.

It is understood that Housing & Care 21 wish to redevelop the site, as it does not meet the current sheltered housing offer, and there are many concerns regarding the current scheme. Although it is understood to be generally fully let, the scheme would require significant repairs, maintenance and investment, to address issues such as damp, lack of inclusive access etc.

It is noted that the proposal is to redevelop the site and to retain sheltered/retirement housing, to re-provide the existing 24 x 1 bed flats for affordable rent, as a replacement of the existing flats, and additional accommodation to provide a total of 40 units, with the additional 16 units stated to be retirement housing for affordable shared ownership and outright sale.

Policy DMHO5 Housing to Meet Specific Community Needs states that the loss of existing housing will be resisted where it meets identified specific community needs, unless it can be shown that the accommodation is no longer needed, or that the existing accommodation will be adequately re-provided to an equivalent or greater standard in a different way or elsewhere, or the new accommodation will instead meet another identified priority local need. This approach is continued in Policy LP37.

Under Policy DMHO5 paragraph 5.1.34 in the Development Management Plan it recognised as a priority the remodelling of older peoples sheltered accommodation. Paragraph 9.4.9 in the Publication Local Plan also states current housing priorities include remodelling of older peoples sheltered accommodate to provide self-contained units. The Council priority is generally for conventional housing including affordable housing, reflecting the priority need set out in Local Plan evidence and the Council's housing strategies, in line with Policies CP15 and LP36.

The Council's Retirement Housing Review (October 2016)

[http://www.richmond.gov.uk/retirement\\_housing\\_review.pdf](http://www.richmond.gov.uk/retirement_housing_review.pdf) aims to inform decision-making by the Council's housing, health and social care commissioning functions, as well to assist providers of retirement housing when reviewing existing stock or developing new schemes. It recognises the vast majority of the retirement housing units in the Borough are one bedroom and studio properties and suggests Registered Providers should consider continuing to remodel and modernise accommodation which is deemed to be unsuitable to ensure that the retirement housing available is high quality. It states providers should

minimise the loss of social rented units and disruption to existing residents and communities. It estimates that 145 additional units of retirement housing are required to address the current shortfall of supply and likely increase in demand, across 3 or 4 schemes in the borough and sets a timeframe of 2020 for the delivery of these units. These figures include remodelling existing units. It recommends a mix of market scale, intermediate sale and social rented units (76 should be sold at market rates, 35 units for intermediate sale and 34 social rented units). It states developers of retirement housing should engage with the Council to ensure that they bring forward retirement housing products which are viable and meet local needs in relation to housing and infrastructure.

In principle given the re-provision of existing units and the opportunities to improve the existing standard of accommodation for occupiers, aid the management of the units and improve inclusive access, can be detailed in an application to address Policy DMHO5.

Policies CP15 and LP36 expect at least 50% on-site provision of affordable housing on large sites, and seek an 80/20 split between rented and shared ownership. Rented units would need to comply with the Council's adopted Tenancy Strategy with regard to Affordable Rent and shared ownership units would need to comply with the affordability requirements of the Council's adopted Intermediate Housing Policy Statement and accompanying marketing guidance.

The Supporting Statement suggests the proposal is to replace existing social rent properties with affordable rent, however this would require further discussion about proposed rent levels; it is assumed that returning residents would be offered homes as social rent. It states to 'self-finance' the scheme, additional units will be for shared ownership and market sale. It will need to be justified that existing tenants can be accommodated, and there is a need to ensure affordability for new tenants. The proposal will provide at least 60% as affordable rented units; the number of affordable homes will increase subject to clarification of the proportion that will be for market sale.

It is recognised that it may be considered appropriate to include an element of market housing to enhance viability. Further discussions with the Council's housing development officers will be necessary in order to ascertain that the proposal has been satisfactorily explored with the Council - to influence the tenure mix, design and explore funding streams, to address policy requirements. Clarification about rent levels for the re-provided units to ensure affordability for returning residents and to comply with the Tenancy Strategy is required and the proposal should secure nomination rights to the rented units for the Council, subject to further clarification about the number of existing tenants who will occupy re-provided homes. This will also need to address a decant strategy. Overall the Council needs to be satisfied that the delivery of on-site affordable housing has been maximised to address policy requirements. It should be noted that full public disclosure of financial information should be expected to inform transparent decision-making. This evidence of discussions, in relation to funding and viability, are necessary to accompany an application to satisfy the requirements of the Local Validation Checklist.

Policy DMHO4 requires family housing outside of town centres. The mix should be informed by the proposed tenure. For sheltered accommodation/retirement accommodation it is recognised that a mix of 1 and 2 beds is appropriate to include opportunities for downsizing, which could accord with Policies DMHO5 and LP37.

The standards set out in Policies DMHO4, Policy LP 35 (B) and the Residential Development Standards SPD should be addressed. Since 1 October 2015 the Council has been applying the nationally described space standard. This sets a minimum gross internal floor area of 50sqm for a 1 bed 2 person one storey dwelling and 61sqm for a 2 bed 3 person one storey dwelling. The proposed unit sizes appear to meet these standards.

I note there are four flats proposed at lower ground floor. The Supplementary Planning Document: Residential Development Standards states 'Habitable rooms within basements should be preferably dual aspect to enhance cross ventilation and good daylight levels to otherwise compromised living conditions. Generally basements should be used for non-habitable or recreational areas rather than bedrooms or living rooms.' It states 'Single unit flats should not be located solely in full basements.' No elevations are provided and it is appreciated that there is a difference in levels across the site, so it may be that the description of lower ground floor is more accurate, rather than a fully fledged basement level.

The Council still seeks the provision of external amenity space in accordance with Policy DMHO4 and the Residential Development Standards SPD, and Policy LP 35 (C and D). The Supporting Statement states that the balconies, designed for active use, will provide for the one bed flats a minimum balcony area of 25sqm, increasing to a minimum of 30sqm for two bed flats. This would provide for a good level of amenity; however the proposed balconies would need to be assessed against the criteria set out in Policies DMDC6 and LP 8 (3) Amenity and Living Conditions.

Policy CP14 requires all new homes should be built to Lifetime Homes Standards and 10% to wheelchair standards. Since 1 October 2015 90% of new housing would be expected to meet Building Regulation Requirement M4 (2) 'accessible and adaptable dwellings' and 10% would be expected to meet Building Regulation Requirement M4(3) 'wheelchair user dwellings'. This is set out in Policy LP35 (E). The Council's Retirement Housing Review (October 2016) states providers of retirement schemes should try to ensure that units are built to the optional higher Building Regulations as this would maximise accessibility and allow for these units to be more easily adapted to match residents' changing needs. This should be addressed in an application and it may be relevant to secure this by condition.

#### Design and impact on heritage assets

As set out in the meeting there are a number of constraints relating to this particular site. It is sited within the Richmond Hill Conservation Area and forms part of the Terrace House and Buccleugh Gardens, which is designated as Historic Park and Garden. It is also within an Archaeological Priority Zone.

Adjacent to the site (north east to south east) is designated Public Open Space, Metropolitan Open Land, Other site of Nature Importance, Thames Policy Area and within and adjacent to Protected View Lines.

With the site being within the Registered Park & Garden, it is noted that the existing buildings are at least very self-effacing, receding into and allowing the historic landscape to remain dominant.

The response to the aforementioned comments from officers is noted with the attempt to break up the massing through a range of heights and series of terraces along with the introduction of greenery within the balconies and to the roof.

In terms of the design, officers remain concerned with the proposed height and massing of the block which would be considerably higher than the existing buildings and occupying a larger footprint. While the balconies offer an opportunity to introduce greenery these also add an element of clutter to the façade drawing attention to the building in this sensitive location.

Interestingly, I am led to believe that the designation of the Historic Park and Garden was made after the current buildings were built. This is somewhat unusual and relevant as in some case similar designations deliberately skirt around built form to exclude it from the designation so there was good reason for its inclusion despite its limited architectural and historic merit. In this respect however there is a historic association and setting in the landscape, tucked in within the surrounding trees.

The concern in relation to height is that the proposal would punctuate the skyline and the tree line and could therefore be visually intrusive in its surroundings. The footprint of the building would result in a continuous block and could be read as being of substantial mass and whilst the introduction of glazed linkages could be successful this will depend on the execution and how this can be demonstrated to limit the appearance of the scale, bulk/mass.

A relatively modern approach to the design may be acceptable and it is recognised that such a design may facilitate a reduced mass as well as the ability to incorporate features such as the green roof. The green roof is welcomed as it would allow the building to assimilate with the surroundings that may not necessarily be readily achievable in a traditional approach to design.

In relation to views, there is a specific view which cuts through the site, from Richmond Hill towards Asgill House to the north west, providing views of the river and the listed structures of Richmond and Twickenham bridges. The site is also contained within wider views from Richmond Bridge looking east and on the periphery of the wider views from Richmond Hill looking south west and from the west side of the River Thames looking east/northeast towards Richmond Hill and across Petersham Meadows.

While there are no Buildings of Townscape Merit or listed buildings sited immediately adjacent to the site, it will be important to ensure that the setting of those buildings, positioned below and above the site on this prominent slope and their positive contribution in the wider conservation area is not prejudiced. Any increase in height and mass may affect such a setting were this deemed to be intrusive (in the foreground or background) and seen in the context of the prominent views set out above.

Any interruption in the skyline, above the tree line and obtrusiveness within the protected views will be resisted and particular attention to these views is required in a townscape and visual impact analysis which shall be submitted with an application.

The Thames Landscape Strategy <http://thames-landscape-strategy.org.uk/wp-content/uploads/2015/01/9hham-2014.pdf> doesn't specifically refer to this development or the buildings in the vicinity although it recognises the importance of the views and the landscape setting.

The conservation area statement states that the townscape is subservient to this landscape, trees and the topography of the hill where there may be development pressure which 'may harm the balance of the river and landscape-dominated setting, and the obstruction or spoiling of views, skylines and landmarks' and this is echoed in the conservation area study.

The Study recognises the 'substantial amount of duller inter-war and post-war flat development and that trees soften the junction between old and new'.

Clearly, the detail will be telling and views of the development from a variety of areas will be critical in demonstrating if the proposal will protect and preserve the setting of the wider environment and the designations in place.

Whilst the site is visually secluded, it is difficult to see how a proposed building of this scale could be acceptable in terms of impact on the Terrace Gardens Registered Park & Garden, and, although screened by trees, may also impact on the View from Richmond Hill. Your attention is drawn to the Local Plan Consultation Draft section 4.3.5. This guidance should be followed for a site of this sensitivity, the significance of heritage assets, how the proposals protect these and how particular attention has been paid to scale, design etc.

### Transport implications

The application site is located within the Richmond Hill Community Parking Zone operating Monday to Saturday from 8.30am to 6.30pm. The council's transport planners note that residents of Howson Terrace have not had any residents permits issued historically or currently and thus request that any application coming forward should consider entering into a legal agreement removing access to resident/business/all zone parking permits and contracts in council run car parks for all units proposed.

They also that membership of car club should be secured through such a legal agreement for those units without provision of off street parking.

While off street parking is shown within the lower ground of the development, it is not clear how many parking spaces are proposed, how this space will be used for turning and what amount would be reserved for staff parking. Your attention is thus drawn to the maximum parking standards set out in the Local Plan. Any shortfall will require justification notwithstanding the extent of the CPZ hours as these would not preclude parking on surrounding roads in the evening when there may be more pressure for on street parking spaces.

An application will require demonstration on how refuse/recycling would be collected from the development.

It is noted that cycle parking would be provided in the lower ground level. Cycle parking using Sheffield style stands for this development will be required with separate storage for the flats and assisted care facility. Staff cycle parking will also be required to be provided in a secure, weatherproof and enclosed facility also separately from the two facilities mentioned previously.

Consideration should also be given to additional ground floor cycle parking for visitors and within an area benefitting from good surveillance and provision for electric buggy parking for residents.

A Construction Method Statement is required in draft given the 'one way' system of Richmond Hill and the narrow entrance/exit to the site.

On a minor point, the ramp gradient to the car park will be required and how the ramp be managed as it appears too narrow for two cars to pass each other. It is assumed a traffic light system may be employed and details of this and vehicle waiting space will be required.

### Trees and woodland

The Council's arboriculture officer notes that an investigation concludes that the proposal is within a conservation area and that trees are visible throughout the site with a high concentration on the eastern and southern boundary.

In its current form there are concerns regarding the potential loss of trees within the site and the possibility of excessive shading to properties on the east of the site. Any application submitted shall clearly demonstrate that the development can coexist with the surrounding trees without the potential pressure to significantly lop or fell these where outlook (bearing in mind that the design seeks to maximise views of the River Thames and Richmond Park) and access to light for future occupants may be prejudiced.

It is recommended that a suitably qualified and experienced Arboriculturalist is commissioned to establish tree related constraints and therefore assist with the overall design and any future application includes the submission of an Arboricultural Report, including a Tree Protection Plan and Arboricultural Method Statement, which should be produced by a suitably qualified and experienced Arboriculturalist and be in accordance with British Standard 5837:2012 Trees in relation to design, demolition and construction - Recommendations.

### Ecology/biodiversity

The Council's ecologist has no in principle objections, but states that it is essential the amount of green landscaping and as many of the existing trees remain so there is no disturbance to the buffer between Terrace Gardens and the urban setting river side of the river.

As part of any application, you are required to provide a Preliminary Ecological Appraisal with additional badger (badgers are in the area) and possibly bat surveys (bats are in the area including the possibility of roosts). It will be beneficial to include ecological enhancements (for invertebrates, bats, birds, badgers if applicable, with a potential for a green wall depending upon the difference between existing and proposed green open space) which includes a plan, specifications and maintenance.

In addition, the proposal should be accompanied by landscaping plans, specifications and maintenance and a lighting plan, including a lux contour plan and specifications.

Some concern has been expressed regarding light spill with mitigation required such as tinted glass facing Terrace Gardens to prevent additional such light spill onto the gardens and also allow continued commuting bat corridors for a 10 m corridor.

### Neighbour amenity

The pre application submission has provided limited detail (aside from the site photographs) in relation to the surrounding development and no site visits/inspections are undertaken on such pre application submissions.

The relationship between the proposed development and the residential units to the west and north of the site requires careful consideration. Regard will be given to the existing relationship but with the proposed increase in height, scale and mass coupled with the elevated position to the east with the inclusion of balconies, the development may give rise to an un-neighbourly development.

It would be prudent for an application to provide the relevant information to demonstrate that a proposal would not lead to unreasonable loss of light and outlook and will not appear overbearing, dominant and intrusive.

### Sustainability

Your attention is drawn to the sustainability requirements set out in the Local Plan and the Supplementary Planning Document: Sustainable Construction Checklist. While it is acknowledged that the proposal would be likely to improve the carbon footprint and offer other sustainable improvements this has to be assessed against the loss of the existing buildings.

Any forthcoming applications will require the completion of the sustainable construction checklist and where applicable, provide a BREEAM pre assessment compliance check to demonstrate that an 'excellent' rating can be achieved. In addition, an energy statement and report shall be submitted demonstrating the carbon dioxide offset. From October 2016 zero carbon standards apply to all new major residential development (10 or more housing units) in line with London Plan policy 5.2. This means that at least 35% of regulated CO2 emission reductions (against a Building Regulations Part L (2013) baseline) must be achieved on-site, with the remaining emissions, up to 100%, to be offset through a contribution to the Council's Carbon Offset fund.

The price of carbon is £60/tonne over 30 years in line with the London Plan pricing.

#### Community Infrastructure Levy

Your attention is drawn to the CIL Regulations and while some elements of the proposal may be exempt from CIL this is required to be clearly set out in the submission.

#### Summary

While there is no objection in principle to the proposal, this is subject to demonstrating the level of redevelopment is justified in a number of areas. Subject to demonstration, it is understood that the existing buildings are reaching the end of their lifespan and beyond repair, refurbishment and extension that would be financially viable. Given the existing use and sensitivity surrounding this and the requirement to provide some enabling development, a careful balance is required in assessing the impact, particularly around the design and massing of the scheme.

Officers remain concerned that the overall bulk, height and scale would not be appropriate in this setting and such harm may not necessarily be outweighed by securing the long term future of the existing housing.

#### Without prejudice

Any advice given by Council officers for pre-application enquiries does not constitute a formal response or decision of the Council with regards 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 circumstances 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)

Yours sincerely

A handwritten signature in black ink, appearing to be 'R Angus', written in a cursive style.

*RP* Mr Robert Angus  
Head of Development Management (Richmond)  
Serving Richmond and Wandsworth Councils



**APPENDIX 2**

**COUNCIL PRE-APPLICATION ADVICE 30 JUNE 2020**

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Our ref: 20/P0090/PREAPP

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**BY EMAIL ONLY**

30 June 2020

Dear Mr Rainey,

**Town and Country Planning Act 1990 (as amended)**  
**Howson Terrace, Richmond Hill**

I write further to your meeting with Wendy Wong Chang held on 4 May 2020. This advice is based on your most recent proposal and essentially updates the previous pre-application advice provided to you in 2017.

This pre-application submission follows previous conversations you have had with officers where concerns have been expressed with regard to size, height and mass in relation to the identified heritage assets. The principal issues relevant to your most recent proposal have been summarised below and have been set out to you in previous meetings. Given the similarities with the scheme previously presented, much of this information reiterates/updates the previous written advice that has been provided to you.

Policy context

As set out previously the main relevant policies to the development remain as follows although there have been more recent updates to SPD. These are set out on Richmond's website:

*Local Plan (2018):*

LP1, LP3, LP4, LP5, LP7, LP8, LP10, LP12, LP13, LP15, LP16, LP17, LP18, LP20, LP22, LP34, LP35, LP36, LP37, LP38, LP44, LP45.

Adopted Supplementary Planning Documents;

- Buildings of Townscape Merit (2015)
- Residential Development Standards (2010)
- Affordable Housing (2014)
- Sustainable Construction Checklist Guidance Document (2016)
- Design Quality (2006)
- Transport (2020)
- Refuse and Recycling Storage Requirements (2015)
- Small and Medium Housing Sites (2006)
- Planning Obligations SPD (2020)
- Air Quality (2020)
- Development Control for Noise Generating and Noise Sensitive Development (2018)
- Richmond and Richmond Hill Village Plan (2016)

All relevant policies can be accessed from Council's website via link below:

[https://www.richmond.gov.uk/services/planning/planning\\_policy/local\\_plan](https://www.richmond.gov.uk/services/planning/planning_policy/local_plan)

Note that the New London Plan is in its final stages of preparation and I would anticipate likely to be adopted before any planning application pursuant to this proposal is submitted. The policies therein are currently given weight as a material planning consideration and once adopted will form part of the Development Plan. The standards set out in the Intend to Publish Plan policies should therefore be built into your consideration of the scheme at this stage, notably for example on sustainability standards, air quality and parking.

#### Land Use

The Council is in general supportive of the principle of proposed development to provide 'affordable' retirement apartments by a Registered Provider provided the justification/requirements set out in policies LP37 and LP36 are fully addressed.

The scheme is now for 30 no. units (27 x 1 bed and 3 x 2 bed) be offered to people of retirement age (over 55 years), although the specific tenure mix is yet to be agreed. I note the covering letter requests the Council provides advice in relation to the preferred mix, although this is linked with the need for clarity on tenure (mix of rented or shared ownership, affordability levels) as such it would be useful to know if the decant strategy includes re-provision for those residents who have been moved to other schemes. Further discussions with the Council's housing development officers will be necessary in order to ascertain that the proposal is satisfactory in terms of tenure mix, design and explore funding streams, to address policy requirements in LP36.

The Housing Officer has commented that previous correspondence and research confirms that Council's nominations agreement with Housing 21 enables the applicant to allocate 25% of their available properties to tenants of their own choosing (Council have rights to nominate the remaining 75%) to allow flexibility to cater for these circumstances. This amounts to 22 of

the current total of properties (30) in the current scheme. The Council would therefore expect the new proposed scheme to include retention of these rights as a minimum, unless it can be demonstrated that a lesser percentage is the maximum viable through submission of a financial appraisal in the normal way.

Council's starting point will be to deliver 22 of the proposed homes as a minimum as London Affordable Rent with the remainder being for Shared Ownership/Shared Equity. As the scheme includes 3 x 2bed units it would be preferable if these are provided for rent, suitable for occupation by a single person with carer space included. Given the location on Richmond Hill it seems unlikely that any homes for sale would meet our Intermediate Housing Policy requirements. This will be a matter for clarification with Housing 21 as the scheme progresses.

However, to note is that the baseline requirement is 75% of the total number of units to be proposed in any subsequent schemes.

In view of the above, you are strongly advised to engage with Council's Housing Officer to agree on the tenure and unit mix prior to the preparation of a formal application and it was agreed at the meeting that the applicant will undertake separate discussions directly with Paul Bradbury on this matter.

#### Design and impact on heritage assets

Without re-iterating the site description/constraints in this pre-application advice, I would like to focus mainly on the current scheme in design terms.

The current scheme has been designed to follow the contours of the site and steps down from 5 storeys on the northern end to 3 storeys on the southern end. Projecting bays, balconies and terraces have been introduced to add visual interest on both the front and rear elevations.

Whilst there are no objections to the more organic design approach presented under this submission, which is considered an improvement to earlier schemes, concerns remain in relation to the overall height, scale and massing which is still considered to be excessive in this very sensitive location. You are therefore advised to consider exploring a reduction in height by one storey across the entire scheme with the taller element remaining on the northern end. The reduction in height may also address the impact on residential amenity of the occupants at Robin Court set out in detail in the following section on 'Amenity'.

In terms of the visuals, these are mostly of long views towards the site and they demonstrate that there is very little change in terms of visual impact in the selected views from the earlier pre-application submission. However, as highlighted in the meeting by both Marc and Wendy that of most concern with the current scheme is the impact within Terrace Gardens, and from Richmond Hill, as the current scheme is still considered to detract from the special landscape qualities of the location.

It is also noted that the visuals are summer views, with the trees/leaves obscuring the site. Irrespective of the density of existing trees and vegetation within Terrace Gardens, there will

be points closer to the development itself, where there will be additional scale impact which the Council objects to.

Whilst the site may be screened by existing trees in Terrace Gardens, however any scheme would still need to have consideration to the overall setting, character and appearance of the heritage assets that the site adjoins and it is not considered the current scheme has satisfactorily addressed the harm previously identified.

As previously advised, the NPPF and local policies require that an applicant describe the significance of any heritage assets affected. The NPPF continues to state that, "significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional."

Within the details provided so far, there has been no meaningful analysis made of the significance of this site's inclusion within the Historic Park & Garden designation. In the absence of this and given the scale of the development, at present there is no reason for the Council to conclude that the level of harm to the heritage asset would not be substantial by destroying the significance of this area of the designation. The NPPF continues that where a proposed development will lead to substantial harm or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.

Therefore, we would reiterate our previous advice, that in the immediate short-term to assist in your deliberations as to whether to progress with the scheme, and to inform the weight to be attributed to the harm/benefits in the planning balance, we advise you to:

- Continue a dialogue with Housing to ensure that they can fully support and confirm the benefits of the scheme. The details on tenure would be vital to setting out the benefits.
- Approach Historic England and the Gardens Trust to assist with the assessment of the contribution that this element of the registered park and garden makes to the listing and the impact of the scheme on the heritage asset

In terms of a contact at the Garden Trust, I set this out again:

E-mail: [office@londongardentrust.org](mailto:office@londongardentrust.org)

Turning to the roof terraces, these are considered to be an incongruous design feature and given each flat benefits from their own private amenity space, it is not considered these to be necessary and it is suggested that these are omitted and replaced with green roof to better improve on the sustainability benefit of the scheme.

In terms of materials, there are no objections to the use of bricks though the use of more modern materials may be suitable provided it can be demonstrated that they will harmonise with the overall appearance of the conservation area and the locality in general.

Overall, it is not considered that the design and siting of the proposed building can be undertaken in isolation without fully understanding the constraints of the site and adjoining sites. Further constraints may be identified following the preparation of an AIA as there may be need to re-site certain parts of the scheme to ensure the health and longevity of all on and off-site trees are maintained. This will be discussed in more detail in later sections of this report.

On a separate note, should you choose to progress to a formal application, we would encourage you to consider presenting a subsequent amended scheme to the Design Review Panel and further details can be found from our website via link below:

[https://www.richmond.gov.uk/services/planning/richmond\\_design\\_review\\_panel](https://www.richmond.gov.uk/services/planning/richmond_design_review_panel)

### Housing Mix and Standards

The final tenure mix/unit type would need to be justified with evidence of discussions with Paul.

Policy LP 35 (B) requires new housing to comply with the nationally described space standard. The unit sizes shown on the proposed plans appear to exceed the relevant standards. A Residential Standard Compliance Statement will need to be submitted with any future application.

The requirements of Policy LP35 (C and D) and the Residential Development Standards SPD apply to external amenity space. A minimum of 5 sqm of private outdoor space for 1-2 person dwellings plus an extra 1 sqm should be provided for each additional occupant. The plans show the flats all have access to private amenity space in the form of balconies. Given the concerns raised in relation to the balconies on likely impact on residential amenity of nearby occupants in Robin Court, balconies may need to be re-sited/omitted from future schemes and an alternative form of private amenity space would therefore need to be explored to satisfy the above requirements.

There are concerns to the quality of accommodation, in particular to the bedrooms to the units sited at Lower Ground and Ground floor levels which may be affected by existing site constraints as they may be significantly overshadowed by existing off-site trees. Whilst no information has been submitted at this stage, a section through each bedroom to units, in particular those identified as 0.04, 0.05 and 0.06 in the LG floor plan will be necessary to demonstrate they can all benefit from adequate daylight/sunlight, ventilation, outlook and openable windows. Substandard layout and accommodation will not be accepted.

Policy LP35 (E) requires 90% of new housing to meet Building Regulation Requirement M4 (2) 'accessible and adaptable dwellings' and 10% to meet Building Regulation Requirement M4(3) 'wheelchair user dwellings'. An application would need to clarify which standards will be achieved (and specific units identified) for this to be secured by condition.

### Neighbour amenity

As previously advised, any proposal for new buildings of the scale envisaged in this location would be required to demonstrate that the proposed built form and orientation of the dwellings would not cause a significant loss of sunlight/daylight to the windows of

neighbouring properties, outlook from existing rooms or sunlight to amenity areas. In this respect, an assessment should be undertaken prior to formal submission to confirm that daylight and sunlight availability to neighbouring residential properties would satisfy BRE (British Research Establishment) recommended values and occupiers would not be unduly harmed. The outcome of the assessment may necessitate amendments to the scheme.

It had also previously been noted that the proposed scheme would dramatically alter the outlook for several of the flats within Robins Court and could appear as very overbearing and enclosing when viewed from the rear of adjacent residential properties of in particular at 88-126 Robins Court. For example, the rear of flats within the 3-storey block at 98-112 Robins Hill, located further down the natural slope would be approximately 10 metres from the development.

Before undertaking any further assessment on daylight/sunlight, you are strongly advised to ascertain the rooms to which each of the rear facing windows (that faces towards the proposed development) on Robins Court serves. The key concerns will be those windows serving habitable rooms, in particular those at no. 88-112 Robins Court, given the minimal separation distance to the proposed scheme.

Additional sections including the BRE 25 degree angle were submitted during this submission to address the concerns raised by Wendy during the meeting. Whilst these sections are useful to enable Officers to better understand the site levels, however it is unclear whether the angle is taken from the centre point of the lowest windows along the rear elevation of Robin Court. Further clarification should be submitted at formal application stage. In any case, the section demonstrates the concerns raised by Wendy in that a full storey exceeds the maximum obstruction angle and would therefore need to be omitted in any future scheme to ensure the residential amenity of these occupants are safeguarded. However, the overall height of the scheme may need to be further adjusted when the centre points of the lowest windows on Robin Court are established.

Notwithstanding the above, the distance between habitable rooms must have at least 20m separation distance and the distance between habitable room to side facing window or flank wall must be at least 13.5m. Whilst appropriate privacy screening/obscure glazing may mitigate against any undue loss of privacy/overlooking, these may create design concerns as such a careful balance will need to be made between finding an appropriate layout and design for this constrained site.

Depending on the separation distances, the balconies facing Robin Court may need to be redesigned to prevent loss of privacy and overlooking as well as perceived loss of privacy to the existing occupants.

Whilst it is appreciated there are a number of trees sited between the site and Robin Court, however given these do not offer a degree of permanence, they should therefore not be considered as a baseline situation to justify higher density development or balconies in this location.

There are design concerns to the extensive roof terraces being proposed, these are also considered to result in overlooking/loss of privacy and/or perceived overlooking/loss of privacy as such this design feature should be omitted in any future schemes.

The above highlights the general concerns raised by officers based on the limited information submitted as part of this pre-application submission.

### Transport implications

Our previous advice to you remains relevant. The site is located immediately west of the B321 Richmond Hill, within controlled parking zone A1 – Richmond Town operating Monday to Saturday from 8.30am to 6.30pm. Details of this CPZ can be seen at:

[https://www.richmond.gov.uk/media/8350/doc-parking\\_zone\\_a1\\_a2.pdf](https://www.richmond.gov.uk/media/8350/doc-parking_zone_a1_a2.pdf)

#### *Vehicular Parking*

Local Plan Policy LP45, Para. 1 states that:

*The Council will require new development to make provision for the accommodation of vehicles in order to provide for the needs of the development while minimising the impact of car-based travel including on the operation of the road network and local environment and ensuring making the best use of land. It will achieve this by:*

- 1. Requiring new development to provide for car, cycle, 2 wheel and, where applicable, lorry parking and electric vehicle charging points, in accordance with the standards set out in Appendix 3. Opportunities to minimise car parking through its shared use will be encouraged.*

The site has a PTAL score of 1b. Appendix 3 of the Local Plan states that the maximum standard of off-street parking that would need to be provided at this site would be 1 space per dwelling, a total of 30 spaces required however only 11 spaces have been proposed.

Para. 11.2.3 of the Local Plan 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. In general, it is expected that in PTAL areas of 0-3 the standards should be met.*

The site is within Census Mid-Level Super Output Area Richmond 008. In this area, households living in flats tend to have use of 0.66 vehicles per dwelling. Were this guidance to be followed, the scheme would still need to provide 20 spaces as such there is currently a parking shortfall. You are advised to submit further technical information which justifies the level of off-street parking proposed and this may include car ownership information from similar sites that you already manage.



Irrespective of the above, future schemes will be expected to enter into a legal agreement to exclude residents/staff of the proposed development from obtaining vehicular parking permits within any CPZ as well as season tickets to Council run car parks. Policy compliant provision should be made for disabled parking and electric vehicles, currently 20% active provision and 20% passive provision.

#### *Transport Statement and Travel Plan Statement*

A transport statement and travel plan statement will need to be submitted with any formal submission in accordance with Policy LP44 and the Local Validation Checklist.

Please also see the Government Guidance on Transport Assessment (Department for Transport, 2007) accessed at: <https://www.gov.uk/government/publications/guidance-on-transport-assessment> and the National Planning Policy Framework (2018), which can be accessed at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

#### *Trip Generation*

The site has a public transport accessibility level of 1b, details of which can be seen at: <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-weecat/weecat?Input=TW10+6RT&PlaceHolderText=eg.+NW1+6XE+or+530273%2C+179613&type=Ptal&zoomLevel=15>. The proposed development is presented as affordable housing for those aged over 55 therefore a TRICS trip generation analysis should be undertaken which bears this in mind. Details can be seen at: <http://www.trics.org/Login.aspx>

#### *Servicing and Refuse Collection*

The applicant proposes a refuse and recycling storage area which is located on the western side of the proposed car park. Future scheme will need to demonstrate that the criteria set out in the Refuse and Recycling Storage and Collection Supplementary Planning Document can be met. The SPD can be accessed at:

[https://www.richmond.gov.uk/media/7627/refuse\\_and\\_recycling\\_storage\\_requirements\\_spd.pdf](https://www.richmond.gov.uk/media/7627/refuse_and_recycling_storage_requirements_spd.pdf)

Because of the distance between the store and the highway boundary, refuse and recycling vehicles will need to get within 15m of the store to collect refuse and recycling. The applicant needs to provide a vehicular tracking drawing which shows that it is possible for a refuse vehicle of 10.4m in length to do this. A to-scale drawing will need to be submitted at formal application stage.

If there are restriction for refuse vehicles to access into the undercroft parking area, you could explore relocating the refuse store or access to the refuse store closer to the car park entrance to avoid the need for the refuse truck to enter into the car park.

#### *Cycle Parking*

The applicant will need to provide secure, sheltered, cycle parking for the new dwellings in accordance with Local Plan Policy LP45 and Appendix 3 of the Local Plan (1 space per 1-bed unit, 2 spaces per 2+ bed units). They should follow guidance set out in the London Cycle Design Standards, which can be seen at: <http://content.tfl.gov.uk/lcds-chapter8-cycleparking.pdf>

Given nature of the occupants, there may be scope for a lower cycle parking provision however this will need to be justified. You may wish to consider submitting details of cycle usage in other similar schemes to justify a lower provision on site.

#### *Travel Plan*

As stated above, all car-free development proposals need to be submitted with a travel plan. Please see guidance in the link below for what this entails: <https://tfl.gov.uk/info-for/urban-planning-and-construction/travel-plans>

#### *Construction Management Plan*

A construction management plan will need to be submitted as part of formal application which has the following information:

- Details of the construction phasing and duration
- Details of the construction vehicles that will need to access the site
- Vehicle tracking drawings showing that vehicles can enter and exit the site in forward gear safely
- Details of where materials will be stored
- An estimate of the number of construction vehicle trips per day
- Details of any temporary traffic orders, suspensions, or highway licences that will be required to facilitate construction.
- Details of wheel-washing facilities for construction vehicles to ensure debris does not get on the highway.

#### Trees and woodland

Council's Tree Officer notes the proposal is adjacent to the Nightingale Lane, Terrace Field Gardens and Walk open space which is maintained by the Council. Trees T5 - T19 along the Eastern boundary are sited within this open space and it appears the development reduces the clearance from the proposed buildings compared to the existing ones.

A full series of arboricultural reports in line with BS5837:2012 'Trees in relation to design, demolition and construction - recommendations' will be required when considering the proposal. This will define the minimum distance between construction and retained trees which the Council may increase where appropriate to account for site specific circumstances and to eliminate post development pressure on affected trees. It should be noted that any proposal that would either despoil or be deleterious to these trees would likely be resisted.

Whilst it is noted that you wish to obtain more detailed advice under this pre-application however, in the absence of the necessary arboricultural reports, Officers are unable to provide further comments as such reports are likely to inform the design and siting of any future building on this site, which may result in further adjustments to a subsequent scheme.

As you are aware any formal application submitted shall need to clearly demonstrate that the development can co-exist with the surrounding trees without the potential pressure to significantly lop or fell these where outlook (bearing in mind that the design seeks to maximise views of the River Thames and Richmond Park) and access to light for future

occupants may be prejudiced. The trees officer has updated their advice as follows *“All category of trees should be included within the information not just A and B category as per the impact assessment provided within pre-application document.”*

As previously advised a suitably qualified and experienced Arboriculturalist would need to be commissioned to establish tree related constraints and therefore assist with the overall design and any future application includes the submission of an Arboricultural Report, including the following:

1. A Tree Survey to include all trees present on or adjacent to a development site as specified in section 4.4, BS5837:2012 'Trees in relation to design, demolition and construction - recommendations (2012). The tree survey is to pay specific attention to the Root Protection Area (RPA) of each tree in relation to the proposed development (for the avoidance of doubt, this must include all trees present on or adjacent to the development site).
2. Any trees identified as either and above or below ground constraint on development in the tree survey, must then inform an Arboricultural Impact Assessment (AIA) that evaluates the direct and indirect effects of the proposed design and where necessary recommends mitigation or where redesign and/or repositioning of the proposed development is needed.
3. Based on the findings of the AIA, a scheme for the protection of the retained trees during the preparation, demolition, construction and completion phases of the proposal, in accordance with and addressing sections 5.5, 6.1, 6.2, 6.3 and 7 of BS 5837:2012, including a Tree Protection Plan(s) (TPP) and an Arboricultural Method Statement (AMS) shall also be submitted.

Informative: The following British Standards should be referred to:

BS:3998 (2010) Tree work - Recommendations

BS:5837 (2012) Trees in relation to demolition, design and construction - Recommendations

NHBC Chapter 4.2 (2018): Building near trees

Given the changes to the site it is important to provide ecological, environmental and bio-diversity benefits and to maximise the quality and usability of open spaces and green infrastructure within the development. As stated in the LBRuT Local Plan LP15 and LP16;

"Landscape design must form an integral part of any proposal and needs to be considered in relation to the development, as a whole, at the start of a project. Landscape design and where appropriate tree planting as well as other green infrastructure elements such as green roofs and green walls, will also need to contribute to and complement the existing character of an area."

In reference to the above and in order to safeguard and enhance the character and amenity of the area. We would require a "Hard and Soft Landscaping Plan" to be submitted in accordance with the requirements of the local plan.

Ecology/biodiversity

Our advice remains unchanged in this regard. The Council's ecologist has no in principle objections, but has reiterated that it is essential the amount of green landscaping and as many of the existing trees remain so there is no disturbance to the buffer between Terrace Gardens and the urban setting river side of the river.

As part of any application, you would be required to provide a Preliminary Ecological Appraisal with additional badger (badgers are in the area) and bat surveys (bats are in the area including the possibility of roosts). It would be beneficial to include ecological enhancements (for invertebrates, bats, birds, badgers if applicable, with a potential for a green wall depending upon the difference between existing and proposed green open space) which includes a plan, specifications and maintenance.

In addition, the proposal should be accompanied by landscaping plans, specifications and maintenance and a lighting plan, including a lux contour plan and specifications. There should be no portable light sources for external seating/garden areas.

Some concern has been expressed regarding light spill with mitigation required such as tinted glass facing Terrace Gardens to prevent additional such light spill onto the gardens and also allow continued commuting bat corridors for a 10 m corridor. Full details of the green roofs with brown features would be required and this should be focused on providing a wildflower species mix, as opposed to a sedum mix, which would be more complimentary to the existing landscape.

You are also advised to include good practice for wildlife within the CMS to be submitted as part of the formal application.

### Sustainability

The proposal, as submitted, will need to be accompanied by an energy report demonstrating the scheme achieves zero carbon standards in line with London Plan (2016) policy 5.2 and draft London Plan Policy SI2. This means that at least 35% of regulated CO2 emission reductions (against a Building Regulations Part L (2013) baseline) must be achieved on-site, with the remaining emissions, up to 100%, to be offset through a contribution to the Council's Carbon Offset Fund.

The price for offsetting carbon is regularly reviewed and changes to the GLA's suggested carbon offset price will be updated in future guidance. A nationally recognised non-traded price of £95/tonne has been tested as part of the viability assessment for the London Plan, which this borough will use to collect offset payments. More information can be found via link below:

[https://www.richmond.gov.uk/services/planning/planning\\_policy/local\\_plan/supplementary\\_planning\\_documents\\_and\\_guidance/sustainable\\_construction\\_checklist](https://www.richmond.gov.uk/services/planning/planning_policy/local_plan/supplementary_planning_documents_and_guidance/sustainable_construction_checklist)

The following will be required to be submitted as part of any future applications:

- A completed Sustainable Construction Checklist  
([http://www.richmond.gov.uk/sustainable\\_construction\\_checklist](http://www.richmond.gov.uk/sustainable_construction_checklist))

- Energy Report demonstrating that the scheme achieves zero carbon standards. (Please note the Council is likely to require an independent review of this report at the cost of the applicant)

The Council may require the Energy Report to be independently reviewed, at cost to the applicant.

#### *Water Efficiency*

The Council has adopted the national Building Regulations 'higher standard' for water consumption of 110 litres per person per day (including an allowance of five litres or less per person per day for external water consumption). All new residential developments including conversions, reversions, change of use and extensions that create one or more new dwellings must meet this target.

A National Water Standards Statement: demonstrating water consumption of 110 litres per person per day (including an allowance of 5 litres or less per person per day for external water consumption) will need to be submitted as part of any future application.

#### *Surface Water Drainage Strategy*

The Council will require the use of Sustainable Drainage Systems (SuDS) in all development proposals.

The proposed development will result in a change of the gross floor area of the site. Therefore, surface water run-off volumes and rates will change. The applicant must submit a surface water drainage strategy prioritising sustainable urban drainage systems and complies with guidance set out in the document in the link below: [https://www.richmond.gov.uk/services/planning/sustainable\\_drainage\\_systems](https://www.richmond.gov.uk/services/planning/sustainable_drainage_systems) in accordance with the National Planning Policy Framework. The strategy must show that any increase in surface water run-off can be accommodated on site and that there will be no additional private surface water drainage into the highway.

It is recommended that an extensive green roof is explored to alleviate surface water runoff volume and rates and to ensure compliance with LP 21 of the Local Plan. In addition, the following will be required to be submitted:

- London Sustainable Drainage Proforma  
Link below: [https://www.richmond.gov.uk/services/planning/sustainable\\_drainage\\_systems](https://www.richmond.gov.uk/services/planning/sustainable_drainage_systems)
- Statement on Sustainable Drainage Systems  
This to include the proposed Sustainable Drainage System to be incorporated in the development, along with details for their long term management and maintenance.
- Foul sewage and utilities statement

Which should be accompanied by a letter of confirmation from the appropriate water utility company that sufficient capacity exists in the public sewerage and water supply network to serve the development or can be provided before construction is complete.

You can contact Thames Water's free pre planning service: <https://www.thameswater.co.uk/preplanning>

### Archaeology

Excavation is proposed. Therefore, the application would be expected to be supported with an Archaeological assessment as the site is within an Archaeological Priority Area.

### Flooding

Given its elevated position the site is not within an identified area of high flood risk. However, details of SuDs would be required to be submitted with any formal application as the size and scale of development could have an impact on the local surface and foul water drainage infrastructure. It will also need to be demonstrated that any future development would not result in flooding elsewhere in the drainage system.

### Air Quality

LP10 and the Council's recently adopted Air Quality SPD apply to all major development schemes and at the minimum an air quality and dust risk assessment will be required for construction impacts and an Air Quality Neutral assessment. See para 127 onwards and para 132 of the [SPD](#) for validation requirements and note this should feed into the Health Impact Assessment process. The Air Quality SPD and [Planning Obligations SPD](#) sets out that a financial contribution will be required to contribute to off-site measures where it is not possible to fully mitigate the air quality impacts on-site.

### Community Infrastructure Levy

Your attention is again drawn to the CIL Regulations and while some elements of the proposal may be exempt from CIL this is required to be clearly set out in the submission.

### Community Engagement

Given the sensitive nature of the proposed development, early community engagement is very strongly recommended. For major schemes, a community engagement report will need to be submitted at formal application stage.

In view of existing situation restricting social contacts, you are advised to explore alternative methods of engaging with local community via websites. You could still send letters to community groups, Councillors, residents, etc and prepare a website setting out your proposal and allow for questions/comments to be submitted.

### Planning Performance Agreement

Given the scale and complexity of the proposed development, should a future scheme materialise we would advise you to consider entering into a Planning Performance Agreement to engage Officers in further meetings and planning guidance at both pre-application and pre-determination stages.

### Summary

Given the existing use and sensitivity surrounding this site and the requirement to provide some enabling development, a careful balance is required in assessing the impact, particularly around the design and massing of the scheme.

Whilst the more organic design approach is considered an improvement from earlier scheme, Officers remain concerned that the overall bulk, height and scale would not be appropriate in this setting and such harm may not necessarily be outweighed by securing the long term future of the existing housing.

Overall, a careful balance is going to have to be made between finding an appropriate layout and density for the site, the relationship and separation between neighbouring buildings, the provision of sufficient landscaping, planting and residential amenity space and parking and servicing of the site in order to accord with the Council's development plan.

#### Submission Documents

As well as those documents listed above in this letter, you are advised to review the Local Validation Checklist to ascertain the drawings/reports/documents associated with a major/minor development will need to be submitted with any future application. Further information can be found via link below:

[https://www.richmond.gov.uk/media/18491/local\\_validation\\_checklist\\_for\\_all\\_applications.pdf](https://www.richmond.gov.uk/media/18491/local_validation_checklist_for_all_applications.pdf)

#### Without prejudice

Any advice given by Council officers for pre-application enquiries does not constitute a formal response or decision of the Council with regards 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 circumstances 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)

Yours sincerely



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