

Planning Statement

Thames Young Mariners, Riverside Dr, Richmond
TW10 7RX

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Prepared for:
Surrey County Council

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Where great relationships yield the best property outcomes

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1 Introduction

- 1.1. Vail Williams LLP have been instructed by Surrey County Council (SCC) to prepare this planning statement to support the full planning at Thames Young Mariners, Riverside Drive, Richmond, TW10 7RX for, *'Demolition of existing outdoor learning buildings and development of replacement outdoor learning buildings, associated residential accommodation, changing block, replacement staff accommodation unit and outdoor activity equipment including high ropes, climbing wall, coasteering course, supporting pontoons with associated landscaping enhancements and parking.'*
- 1.2. The site is located within the administrative boundary of London Borough of Richmond Upon Thames (LBRuT).
- 1.3. This planning statement will provide the site background and surrounding context and key planning policies, which the proposal should be assessed against. The statement will use this information to assess the proposals' compliance with national and local planning policy and come to a balanced planning judgement on the proposals as a whole.
- 1.4. This planning statement should be read in conjunction with the suite of technical documentation which has been prepared to support the full planning application in addition to the Metropolitan Open Land (MOL) statement which has been prepared by Vail Williams and covers specific matters on MOL/Green Belt.
- 1.5. TYM was established over 60 years ago. The site offers a variety of water activities to help young people and adults hone and learn new and existing skills within their 25-acre site and 10-acre enclosed lake. Such activities include open water swimming, paddleboarding, kayaking, and sailing. The majority of programmes and daily activities currently occur through late spring, summer and early autumn with fewer residential stays during the colder months, as all overnight accommodation is provided in the on-site Tepee village, or visitor's tents pitched for groups including Duke of Edinburgh. The majority visits are by school groups. Pupils travel to and from the site by coach or minibus during term time and are dropped off and picked up by parents/guardians in school holidays.
- 1.6. The land comprising the Thames Young Mariner's is operated by Surrey Outdoor Learning & Development (SOLD). Thames Young Mariners (TYM) requires redeveloping in order to bring the site up to the current health and safety standards with modern, fit for purpose facilities, which would allow SOLD to increase its service capacity and strengthen its commercial operation for SCC.

2 Site and Surroundings

- 2.1. The site is located in Richmond, one of London's outer boroughs, with a population of around 187,000, according to the most recent census. Richmond Town Centre is approximately 1.9 miles northeast of the site and access to the A307, which connect Kingston Upon Thames and Richmond Upon Thames, is approximately a 5-minute drive east of the site.
- 2.2. There are two bus routes serve the area, with an additional local bus to Kingston, and on to Morden. There is no rail station, with the closest stations at Richmond and Kingston, or Teddington and Twickenham on the other side of the river.
- 2.3. The site lies within an area of an area of Metropolitan Open Land (MOL), an Other Site of Nature Importance and Thames Policy Area as designated by the Local Plan.
- 2.4. The red line site area is 3.75ha to the south of the existing water body. SCC's ownership extends to the northern side of the lake, however this area is established habitat and therefore is remaining unaffected by the proposals so is not considered in further detail within this report.
- 2.5. The majority of the red line site area lies within flood zone 1, save for the areas of lake and its banks included within the application boundary which are flood zone 3.
- 2.6. The site is bordered by the River Thames to the west and beyond this are residential dwellings varying from two to three storeys in height. To the north, the site is bound by a large lake, which is used for a variety of water-based activities.
- 2.7. To the east of the site are a mixture of residential dwelling comprise of two-storey houses and three-storey flats. The Thames Young Mariners base is however located approximately 295 metres down a long access road and shielded behind established hedgerows and trees. The closest neighbouring property is located approximately 175m away.
- 2.8. The site sits between Ham Lands Nature Reserve to the north and south which forms an area of undeveloped open space around the site.
- 2.9. The site has one main access point for all vehicles. This is located off Riverside Drive and leads onto a long access road, which eventually splits in two providing vehicles with access to the main reception area, turning point and drop off zone and the other leading to parking located behind one of the outbuildings.

- 2.10. The TYM base is an existing centre offering outdoor and water-based activities for young people. The site requires redevelopment in order to bring the site up to the current health and safety standards with modern, fit for purpose facilities, which will allow the next few generations to enjoy the brilliant activities that SOLD are able to offer.



Site aerial courtesy of Google Maps

- 2.11. The site comprises a range of buildings which had been developed in a piecemeal manner over time with the buildings varying in size, scale, age, and materials. The buildings are used for a variety of purposes including activity space, meeting/classrooms, dry storage, changing space, PPE storage, maintenance area, hall, kitchen, and catering space. Full details of the existing buildings have been provided within the Design and Access Statement. In addition to the existing buildings on site, there are also a number of activity areas associated with SOLD's existing operations which includes the climbing wall, low ropes course, archery and Little Squirrels area. There are also several activities which take place on the water but do not require built development.

3 Planning History

- 3.1. There are a number of planning applications relating to Thames Young Mariners, according to Richmond Borough Council website. It should be noted that the two most recent applications for a lattice tower were not submitted by SOLD or SCC.

App No.	Description	Decision	Date
20/2120/TEL	<i>The proposed installation of a 15 metre lattice tower with 6 no. antenna, 4 no. transmission dishes, 2 no. GPS Modules, 6 no. radio cabinets and 1 no. meter cabinet, in addition to ancillary development equipment thereto, including 15 no. Remote Radio Head and 18 no. ERS units new fencing and associated hard and soft landscaping.</i>	Refused	29/09/2020
19/2981/TEL	<i>Installation of Telecommunications 18 metre lattice tower with 6 no. antenna at the top, installatio of 4 dishes. Installation of 2no. GPS modules above the antenna. Installation of 15 no. RRH's fixed to tower leg. Installation of 18 no. ERS units fixed to tower legs. Ancillary equipment.</i>	Refused	18/11/2019
17/4601/PS192	<i>The proposal is for the replacement of existing timber mitre lock gates with new lock gates.</i>	Approved	07/03/2018
03/0757/FUL	<i>Erection Of A Climbing Wall To Be Located Within The Central Courtyard Space Between Three Of The Existing Buildings Used In Connection With Outdoor Educational Activities.</i>	Approved	24/04/2003
11/3335/FUL	<i>Erection of a low ropes course.</i>	Approved	29/02/2012
76/0267	<i>Erection of a single-storey prefabricated building for use as a chart room.</i>	Approved	02/06/1976
67/2338	<i>Construction of new soil drain and water supply pipe.</i>	Approved	19/01/1968
65/1782	<i>Erection of a 6 ft. high boundary fence and construction of a 13 ft. wide concrete approach road.</i>	Approved	20/01/1966

- 3.2. The most recent investment in the SOLD site was in relation to the replacement of the lock gate which controls the level of the lake where the water-based activities are undertaken. As demonstrated by the planning history there has been no major redevelopment of the site for a significant period of time and whilst work has continued to maintain the existing buildings more major investment is required to bring the site up to modern standards.

Pre-Application Stage

- 3.3. National Planning Policy encourages applicants to engage with local planning authorities and other key stakeholders at early stages of the planning process. Extensive engagement has been

undertaken with Richmond Council's planning team in addition to the technical consultees, the Greater London Authority and other stakeholders. This engagement has resulted in numerous iterations of the scheme being presented and comments from the authority being incorporated wherever possible to get to the scheme which is submitted under this full planning application. The details of each pre-application has been included within the Design and Access Statement to show the design evolution through the pre-app process.

4 Proposal

4.1. SCC are proposing to submit a full planning application for:

'Demolition of existing outdoor learning buildings and development of replacement outdoor learning buildings, associated residential accommodation, changing block, replacement staff accommodation unit and outdoor activity equipment including high ropes, climbing wall, coasteering course, supporting pontoons with associated landscaping enhancements and parking.'

4.2. The proposals seek to demolish the existing buildings on site, which are no longer fit for purpose due to their age and construction which totals 1,795.95sqm (GIA) and replaced by five modern buildings totalling 1,974 sqm. There will be a new increase in total floorspace of 178sqm. An extract of the proposed site plan can be viewed below:



4.3. The proposal will include the development of a new main building which will incorporate a hall space, catering kitchen, meeting rooms, toilets, changing space and dry storage. The main building will also incorporate a replacement staff accommodation unit and a single unit for overnight teacher accommodation. There will also be an area of plant space at 1st floor level to meet the necessary sustainability requirements of the building. This plantroom will serve the main building and the adjacent residential blocks to reduce the footprints of the residential blocks. Moreover, heat source pumps will also be positioned here, with heat rejection equipment positioned externally on the flat roof above the kitchen and changing areas.

4.4. The main building will utilise the existing building structure at lower level to retain a lower ground level to the building. The lower ground floor plan ensures it maintains the relationship

with the water's edge via the slipway of the existing development, comprising changing and drying facilities for water-based activities. The changing rooms have been designed to provide flexibility and diversity in use by a variety of user groups who will be using the site. Furthermore, existing storage adjacent to the building is to be transferred to the proposed floating pontoons. The pontoons therefore provide access to the water, combined with storage for boats and other equipment to support the multiple water-based activities.

- 4.5. The redevelopment of the site also proposes three guest residential blocks and will represent an important part of the long-term viability for the site. These blocks will enable school groups to extend their stay on the site to multiple days and fully experience the facilities that SOLD can offer on a year-round basis. The three blocks are identical in design and layout and will create a landscaped space in the centre of the three blocks.
- 4.6. The layout of each residential block is organised around a central corridor with four bed dormitories sharing ensuite shower facilities. Each block will also be facilitated with additional guardian bedrooms are necessary for appropriate safeguarding of each group of children. Additionally, a small flexible room is included in each building for the school group to socialise and gather before and after activities. Within each residential block will be accessible bedroom space, changing and washing facilities.
- 4.7. The proposed camping changing block will serve as a dedicated facility to camping guests throughout their stay at TYM. This accommodation will be located adjacent to the camping area, providing improved access and provision, and improving the overall operation of the site by providing discrete accommodation for different user groups.
- 4.8. The proposed buildings will use a simple materials palette to reflect the surrounding natural environment. Timber cladding will be used across all buildings but will incorporate design detailing to create a high-quality design and appearance of the buildings. A combination of green, wildflower roofs and pitched roofs incorporating PV panels will be included in the scheme.
- 4.9. Several existing areas of hardstanding will be retained and made fit for purpose. These areas include the access road, existing hardsurfaced areas down by the lake and surrounding the buildings, existing low ropes course, archery area and mulch surfacing.
- 4.10. Access to the site for vehicles, bikes and pedestrians will remain from Riverside Drive. Due to the reformation of the buildings on site, vehicular parking will now be situated towards the front of the main building and to the immediate right at the end of the access road. This will seek to create a pedestrian priority area within the main built area of the site. A pedestrian path will be located next to the access road and two pedestrian crossings, one located next to the cycle storage facility and the other next to the activity zone, will allow adults/children to cross vehicular roads on site safely. Cyclist will share the access road with vehicles and will be able to securely lock their bikes away on site.
- 4.11. The proposed development will incorporate a mixed variety of soft landscaping into the site. Native and wildlife attracting species are proposed in key locations on site, such as the southern boundary grassland to the south of the access road, to serve as an extension of the Ham Lands meadow, boundary conditions enhanced with additional native, species-rich hedgerow planting and scattered tree planting within areas of existing grassland. The focus will be on habitat creation and improving connections to the wider Ham Lands and regional green infrastructure.

5 Planning Policy

National Planning Policy Framework (NPPF) June 2021

- 5.1. The NPPF (2021) sets out the Government's planning policies for England and identifies that the purpose for the planning system is to contribute to the achievement of sustainable development.
- 5.2. Please refer to Appendix 1 to view the relevant NPPF in full. A summary list of the relevant policies which have been considered as part of the planning application has been set out below:
- Paragraph 8 – Achieving sustainable development
 - Paragraph 10 – Presumption in favour of sustainable development
 - Paragraph 81 – Supporting economic growth and productivity
 - Paragraph 92 – Achieving healthy, inclusive and safe places
 - Paragraph 93 – Providing social, recreational the community needs
 - Paragraph 98 – Access to high quality open spaces for physical activity
 - Paragraph 119 – Promote effective use of land
 - Paragraph 124 – Support development which makes efficient use of land
 - Paragraph 130 – Achieving high quality design
 - Paragraph 132 – Design quality should be considered through the design evolution
 - Paragraph 147 – Definition of harmful development in the Green Belt
 - Paragraph 148 – Very special circumstances for inappropriate development
 - Paragraph 149 – Forms of appropriate Green Belt development
 - Paragraph 152 – Transition to a low carbon future
 - Paragraph 154 – Avoid increase vulnerability of impacts of climate change
 - Paragraph 167 – Development should not increase flood risk elsewhere
 - Paragraph 174 – Development should contribute to and enhance the natural environment
 - Paragraph 180 – Biodiversity harm should be avoided, mitigated or compensate

The London Plan

- 5.3. The London Plan is an integrated Policy Framework and must be read as a whole. The London plan runs from 2019 to 2041. This date has been chosen to provide a longer-term view of London's development to inform decision making.
- 5.4. Policy GG3 of the London Plan relates to improving the health of Londoners' and reducing health inequalities and those in planning and development should:

... B) *promote more active and healthy lives for all Londoners and enable them to make healthy choice;*

D) *assess the potential impacts of development proposals and Development Plans on the mental and physical health and wellbeing of communities, in order to mitigate any potential negative impacts, maximise potential positive impacts, and help reduce health inequalities, for example through the use of Health Impact Assessments;*

G) *plan for improved access to and quality of green spaces, the provision of new green infrastructure, and spaces for play, recreation and sports.'*

5.5. The following policies (S3 and S5) are key to these proposals and have therefore been written out in full.

5.6. Policy S3 relates to education and childcare facilities and states:

- A) *To ensure there is a sufficient **supply of good quality education and childcare facilities to meet demand and offer educational choice, boroughs should:***
- 1) *prepare Development Plans that are informed by a needs assessment of education and childcare facility needs. Needs should be assessed locally and sub-regionally, addressing cross-boundary issues. Needs assessments should include an audit of existing facilities.*
 - 2) *identify sites for future provision through the Development Plan process, particularly in areas with significant planned growth or need for school places (including Special Educational Needs and Disability places)*
 - 3) *ensure that development proposals for housing and commercial facilities incorporate suitable childcare provision and encourage nursery provision within primary schools, where there is a need.*
- B) *Development proposals for education and childcare facilities should:*
- 1) *locate facilities in areas of identified need*
 - 2) *locate facilities in accessible locations, with good public transport accessibility and access by walking and cycling*
 - 3) *locate entrances and playgrounds away from busy roads, with traffic calming at entrances*
 - 4) *link to existing footpath and cycle networks to create healthy routes to schools, and other education and childcare facilities, to enable all children to travel actively to school (walk, cycle or travel by public transport)*
 - 5) ***maximise the extended or multiple use of educational facilities for community or recreational use, through appropriate design measures***
 - 6) ***encourage the shared use of services between schools, colleges, universities, sports providers, and community facilities, and between early years and health and social care providers***
 - 7) ***ensure that new developments are accessible and inclusive for a range of users, including disabled people, by adopting an inclusive design approach***
 - 8) ***ensure that facilities incorporate suitable, accessible outdoor space***

- 9) *locate facilities next to parks or green spaces, where possible*
- C) *Development proposals should ensure that there is **no net loss of education or childcare facilities**, unless it can be demonstrated that there is no ongoing or future need. Any proposed loss of sport or recreation land (including playing fields) should be considered against the requirements of Part C of Policy S5 Sports and Recreation Facilities.*

5.10 Policy S5 relates to sports and recreation facilities and states:

A. *Development proposals for sports and recreation facilities should:*

- 1) ***increase or enhance the provision of facilities in accessible locations**, well-connected to public transport and link to networks for walking and cycling*
- 2) ***maximise the multiple use of facilities, and encourage the co-location of services between sports providers, schools, colleges, universities and other community facilities***
- 3) *support the provision of sports lighting within reasonable hours, where there is an identified need for sports facilities, and lighting is required to increase their potential usage, unless the lighting gives rise to demonstrable harm to the local community or biodiversity.*

B. ***Existing sports and recreational land (including playing fields) and facilities for sports and recreation should be retained unless:***

- 1) *an assessment has been undertaken which clearly shows the sports and recreational land or facilities to be surplus to requirements (for the existing or alternative sports and recreational provision) at the local and sub-regional level. Where published, a borough's assessment of need for sports and recreation facilities should inform this assessment; or*
- 2) *the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*
- 3) *the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.*

D) ***Where facilities are proposed on existing open space, boroughs should consider these in light of policies on protecting open space (Policy G2 London's Green Belt, Policy G3 Metropolitan Open Land and Policy G4 Open Space) and the borough's own assessment of needs and opportunities for sports facilities, and the potential impact that the development will have.***

5.7. Policy D4 relates to delivering good design and Part F states the quality of development should be retained through to completion by:

- 1) *ensuring maximum detail appropriate for the design stage is provided to avoid the need for later design amendments and to ensure scheme quality is not adversely affected by later decisions on construction, materials, landscaping details or minor alterations to layout or form of the development*
- 2) *ensuring the wording of the planning permission, and associated conditions and legal agreement, provide clarity regarding the quality of design*

- 3) *avoiding deferring the assessment of the design quality of large elements of a development to the consideration of a planning condition or referred matter*
 - 4) *local planning authorities considering conditioning the ongoing involvement of the original design team to monitor the design quality of a development through to completion.*
- 5.8. Policy G3 relates to development within MOL and states, Metropolitan Open Land (MOL) is afforded the same status and level of protection as Green Belt: *1) MOL should be protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt 2) boroughs should work with partners to enhance the quality and range of uses of MOL.*
- 5.9. Policy SI 2 relates to minimising greenhouse gas emissions and states a minimum on-site of at least 35% beyond building regulations is required for major development. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the borough, either:
- 1) *through a cash in lieu contribution to the borough's carbon offset fund, or*
 - 2) *off-site provided that an alternative proposal is identified, and delivery is certain.*
- 5.10. Policy SI 3 relates to energy and infrastructure and states that boroughs and developers should engage at an early stage with relevant energy companies and bodies to establish the future energy and infrastructure requirements arising from large-scale development proposals such as Opportunity Areas, Town Centres, other growth areas or clusters of significant new development. Large Scale developments must incorporate Energy Masterplans.
- 5.11. Policy SI 4 relates to managing heat risk and states:
- A. *Development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure.*
 - B. *Major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the following cooling hierarchy:*
 - 1) *reduce the amount of heat entering a building through orientation, shading, high albedo materials, fenestration, insulation and the provision of green infrastructure*
 - 2) *minimise internal heat generation through energy efficient design*
 - 3) *manage the heat within the building through exposed internal thermal mass and high ceilings*
 - 4) *provide passive ventilation*
 - 5) *provide mechanical ventilation*
 - 6) *provide active cooling systems.*
- 5.12. Policy SI 16 relates to the use and enjoyment of waterways and states: (Waterways – Use and Enjoyment) part B states, *'Development proposals should protect and enhance, where possible, water-related cultural, educational and community facilities and events, and new facilities should*

be supported and promoted, but should take into consideration the protection and other uses of the waterways. Part C further states, 'Development proposals that increase the provision of water sport centres and associated new infrastructure will be supported if a deficit in provision has been identified locally, and if the infrastructure does not negatively impact on navigation or on the protection of the waterway'.

5.13. Appendix 1 refers to the full policies additional policies which have also been considered as part of these proposals and a summary list has been set out below:

- Policy GG1 (Building Strong and Inclusive Communities)
- Policy GG2 (Making the Best Use of Land)
- Policy GG6 (Increasing Efficiency and Resilience)
- Policy D3 (Optimising Site Capacity through the Design-led Approach)
- Policy D5 (Inclusive Design)
- Policy D11 (Safety, Security, and Resilience to Emergency)
- Policy D12 (Fire Safety)
- Policy S4 (Play and Informal Recreation)
- Policy G1 (Green Infrastructure)
- Policy G3 (Metropolitan Open Land)
- Policy G4 (Open Space)
- Policy G5 (Urban Greening)
- Policy G6 (Biodiversity and Access to Nature)
- Policy G7 (Trees and Woodlands)
- Policy SI 12 (Flood Risk Management)
- Policy SI 13 (Sustainable Drainage)
- Policy SI 14 (Waterways – Strategic Role)
- Policy T4 (Assessing and Mitigating Transport Impacts)
- Policy T5 (Cycling)
- Policy T6 (Car Parking)
- Policy T6.5 (Non-residential Disabled Persons Parking)
- Policy T7 (Delivering, Servicing and Construction)

Richmond Local Plan – Adopted July 2018

5.14. The Richmond Local Plan will set out policies and guidance for the development of the borough over the next 15 years. The Local Plan covers a plan period to 2033 and identifies where the main developments will take place, and how places within the borough will change, or be protected from change, over that period.

5.15. Policy LP13 states,

'A. The borough's Green Belt and Metropolitan Open Land will be protected and retained in predominately open use. Inappropriate development will be refused unless 'very special circumstances' can be demonstrated that clearly outweigh the harm to the Green Belt or Metropolitan Open Land.

Appropriate uses within Green Belt or Metropolitan Open Land include public and private open spaces and playing fields, open recreation and sport, biodiversity including rivers and bodies of water and open community uses including allotments and cemeteries. Development will be supported if it is appropriate and helps secure the objectives of improving the Green Belt or Metropolitan Open Land.

B. It will be recognised that there may be exceptional cases where inappropriate development, such as small-scale structures for essential utility infrastructure, may be acceptable.

C. Improvement and enhancement of the openness and character of the Green Belt or Metropolitan Open Land and measures to reduce visual impacts will be encouraged where appropriate.

When considering developments on sites outside Green Belt or Metropolitan Open Land, any possible visual impacts on the character and openness of the Green Belt or Metropolitan Open Land will be taken into account.

D. Local Green Space, which has been demonstrated to be special to a local community and which holds a particular local significance, will be protected from inappropriate development that could cause harm to its qualities.'

5.16. Policy LP 28 relates to social and community infrastructure and states:

A. The Council will work with service providers and developers to ensure the adequate provision of community services and facilities, especially in areas where there is an identified need or shortage.

New social and community infrastructure

B. Proposals for new or extensions to existing social and community infrastructure will be supported where:

1. it provides for an identified need;

2. is of a high quality and inclusive design providing access for all; and

3. where practicable is provided in multi-use, flexible and adaptable buildings or co-located with other social infrastructure uses which increases public access.

Loss of social or community infrastructure

C. Loss of social or community infrastructure will be resisted.

5.17. The full planning policies which have been considered with this application have been set out in Appendix 1, however a summary of policies has been set out below:

- Policy LP 1 (Local Character and Design Quality)
- Policy LP 2 (Building Heights)
- Policy LP 7 (Archaeology)
- Policy LP 8 (Amenity and Living Conditions)
- Policy LP 10 (Local Environmental Impacts and Land Contamination)
- Policy LP 12 (Green Infrastructure)
- Policy LP 15 (Biodiversity)
- Policy LP 16 (Trees, Woodlands, and Landscape)
- Policy LP 17 (Green roofs and walls)
- Policy LP 18 (River Corridors)
- Policy LP 19 (Moorings and Floating Structures)
- Policy LP 20 (Climate Change Adaption)
- Policy LP 21 (Flood Risk and Sustainable Drainage)
- Policy LP 22 (Sustainable Design and Construction)
- Policy LP 23 (Water Resources and Infrastructure)
- Policy LP 24 (Waste Management)
- Policy LP 30 (Health and Wellbeing)
- Policy LP 40 (Employment and Local Economy)
- Policy LP 44 (Sustainable Travel Choices)
- Policy LP 45 (Parking Standards and Servicing)

Ham and Petersham Neighbourhood Plan (2019)

5.18. The purpose of the Neighbourhood Plan is to supplement and build on existing strategic and local policies in the London Plan and the London Borough of Richmond Upon Thames Local Plan which are relevant to key issues in the area of Ham and Petersham. The relevant policies are as follows:

- Policy C1 (Protecting Green Character)
- Policy C2 (Character and Context Appraisals)
- Policy T1 (Assessment of Transport Impact)
- Policy T2 (Motor Vehicle and Cycle Storage)

5.19. Policy CF1 (Community Facilities) is written in full due to it being fundamental to this planning application and states, *'the extension or relocation of local community facilities will be supported, subject to the services provided being maintained or improved. When there is no longer an identified community need for an existing community use or when it is relocated, primary consideration should be given to using and adapting the vacated premises for other community uses.'*

- Policy R2 (Other Businesses and Local Services)
- Policy G1 (Open Spaces)
- Policy G2 (Light Pollution)
- Policy E1 (Sustainable Development)
- Policy E3 (Water Efficiency)
- Policy E4 (Sustainable Drainage (SuDS))

Supplementary Planning Documents (SPD)

5.20. In addition to the borough's Local Plan (), Richmond has a number of supplementary documents and guidance which are material consideration in the assessment of planning applications. These documents are as follows:

- Air Quality SPD
- Design Quality SPD
- Planning Obligations SPD
- Refuse and Recycling Storage Requirements SPD
- Sustainable Construction Checklist SPD
- Transport SPD

6 Planning Considerations

Principle of Development

- 6.1. At the heart of the NPPF there is a presumption in favour of sustainable development. As set out in paragraph 8, there are three components of sustainable development that the planning system should seek to achieve. The planning system should help to 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.
- 6.2. SOLD is committed to achieving positive personal development through outdoor experiences that challenge the mind and body. Through these outdoor experiences, we guide participants to discover more about themselves by learning and developing personal, social, emotional, physical and key skills. TYM is a unique site, which has the potential to provide a much broader, quality experience to their user groups. The site offers access to natural environments, such as water and woodlands, to local communities which makes a significant positive impact to people's lives.
- 6.3. Full details of SOLD's operations and the benefits it brings to people in Richmond, wider London Boroughs and Surrey has been included within the MOL statement which should be read in conjunction with this planning statement. London Plan policy supports the provision of sports and recreation facilities with existing facilities needing to be retained as a key element of social infrastructure for Londoners (policy S5), and contributing towards healthy lives in line with Policy GG3. TYM makes a unique contribution towards Richmond's provision of outdoor learning and education to children and young people in Richmond, Surrey and other London Boroughs. The development will enable SOLD to offer this outdoor learning and education from high quality and sustainable facilities which will support schools, colleges and community groups in their learning curriculum throughout the year. This also aligns with Richmond's Strategic Objectives to, *'Ensure there is adequate provision of facilities for community and social infrastructure that are important for the quality of life of residents and which support the growing population, by protecting existing and, where required, securing new facilities and services that meet people's needs'* and *'Ensure there is sufficient provision of facilities and services for education and training for all age groups to help reduce inequalities and support the local economy; this includes school places as well as children's centres and youth provision and promoting local employment opportunities and training programmes.'*
- 6.4. The proposed development will also ensure the principle of providing outdoor learning and education is retained on site in the long term in sustainable buildings which are fit for the future in line with Policy CF1 of the Neighbourhood Plan and Policy LP28 of the Richmond Local Plan. The policy seeks to resist the loss of social or community infrastructure and supports extensions to existing infrastructure where the space is high quality an inclusive design and multi-use and flexible. The development will allow SOLD to extend this provision of residential accommodation they can offer to schools and groups to a year round offer, compared to current seasonal offering alongside the ongoing provision of the existing facilities but in more accessible and high quality buildings in line with Policy LP28.
- 6.5. Development at TYM will enable SOLD to realise the potential of the site through a significant increase in service capacity, supporting the Council's strategic priorities for children, young people, and families by providing bespoke programmes of personal development, appropriate education, skills training and family support.

- 6.6. Following pre-application discussions with Richmond Council it was made apparent that the redevelopment of TYM should not seek to increase the amount of built form significantly when compared to the existing built form situated on the site. The revised scheme following extensive design procedures now proposes an overall increase of only 151 sqm of built form across the entire site. The proposal would therefore not result in a large net gain in built form on the application site. It has also been made apparent that the proposed buildings need to be modest in size, massing, and scale. As such, the height of the proposed main building has been reduced and the positioning of the remaining proposed buildings are situated over the footprint of the existing buildings.
- 6.7. Another relevant core strategy of the NPPF is to encourage the effective use of land through reusing previously developed land that has been previously developed, provided that it is not of high environment value and will cause adverse impacts on local roads (paragraph 85). As aforementioned, the site comprises outdated buildings, which are no longer fit for purpose. The majority of the redevelopment will be focused on areas of land that are already hardsurfaced. As such, the redevelopment of the site would not result in an adverse impact on the character and appearance of the site and surrounding area. Instead, the proposal will utilise the existing site and make best use of the available space.
- 6.8. It is for these reasons that the principle of the development is considered to be acceptable and in accordance with Policies LP1, LP13, LP18, and LP28 of the Richmond Local Plan and G3, GG3, and D1 of the London Plan subject to consideration of the impact the development may have on MOL and any other relevant technical matters.

Development in Metropolitan Open Land

- 6.9. A separate Operational Need and MOL Statement has been prepared by Vail Williams to support the planning application and comprises a comprehensive assessment of whether the development constitutes inappropriate development in MOL and justification to the benefits of the scheme against any harm arising from development in MOL. Whilst several elements of the scheme are considered to be appropriate development in the Green Belt as they relate to the replacement of buildings on previously development land and development associated with outdoor recreation. However, when the development is considered as a whole, the proposals are considered to have a low impact on the openness of the MOL compared to the existing development and therefore Very Special Circumstances must be demonstrated in line with paragraph 147 of the NPPF.
- 6.10. The statement sets out that the TYM site is unique and the benefits of the proposals are significant and clearly outweigh the low level of harm to the openness of the MOL in these very specific circumstances. The conclusions on MOL impacts need to be considered alongside all other relevant policies to enable a comprehensive assessment to be made in accordance with section 38(6) of TCPA 1990 whereby, 'If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.'

Design

- 6.11. A Design and Access Statement (DAS) has been prepared by Pick Everard and provides full details regarding the design rationale for the proposals. The existing buildings on site were constructed in 1957 as a complex arranged around the lake, with additions added over time to meet the growing requirements. All buildings are single storey except the main block that includes garages and workshop at lower ground level below the hall to the west of the complex.

- 6.12. Policy D4 of the London Plan seeks to ensure that development proposals are in sympathy with the appearance and character of the local environment and appropriate in scale, mass, design, and materials. Policy D5 takes this further by highlighting that developments should be people focused, allowing them to be accessible for all types of users.
- 6.13. Policy LP1 of the Richmond Local Plan requires development proposals to respect, contribute to, and enhance the local environment and character. Policy LP18 highlights that development proposals alongside and adjacent to the river must respect its setting. Policies LP20 and LP22 are also relevant for this section.
- 6.14. Table 1, outlined below, illustrates the difference in built form proposed on the applications site. A proposed Schedule of Accommodation can be viewed in under Section 6.2 of the accompanying DAS.

Proposed Development Footprint	Total Existing Building and Structures	Total Increase in Built Form on Application Site
1,974 sqm	1,823 sqm	151 sqm

- 6.15. Section 5.4.1 in the supporting DAS illustrates how the proposed layout relates to the scale and location of existing development. Following discussions from Richmond Borough Council, several revisions have been made to first proposal submitted at pre-application stage, such as a decrease in the amount of built form proposed across the entire application site.
- 6.16. In summary, the refinement of the design has contracted and consolidated the new buildings to fall within the areas occupied by the complex of existing buildings. The same has been considered for hardstanding areas.
- 6.17. The proposed new main building will replace the existing provision and will vastly improve the operation by being designed to modern standards, removing the limitations of the outdated and unsuitable accommodation, providing fit-for flexible spaces, with improved layout and access.
- 6.18. The main proposed building for the application site will consist of functions arranged within an ‘L-shaped’ footprint. This will be the reception point for visiting groups and individuals and has been designed to be the dominant building to visually represent the point of arrival.
- 6.19. Administrative spaces support the reception area and provide a base for the training staff (employees) between activities. The hall will be used as a multi-function space that is intended to provide an internal gathering area for the large groups and will operate as a dining hall for all visitors, supported by the adjacent kitchen. Changing areas are provided at upper and lower ground levels to relate to water and land-based activity areas. A drying room is included at lower ground floor to store the safety equipment and wetsuits used for these activities.
- 6.20. Proposed building 2 will be single storey with all accommodation accessible from the ground floor. The dormitory style residential space is based on youth hostel space standards, with four children sharing each bedroom with en-suite shower provision. Adult bedrooms are included for guardians to supervise the groups. A fully accessible bedroom and shower room enables inclusion of all abilities within an activity group.

- 6.21. The bedrooms are organised either side of a central corridor in a rectangular building footprint under a pitched roof volume, with a small flat roof canopy to the entrance that adds variety to the building volumes arranged around a social courtyard where campfires will enable groups to continue their outdoor experience. PV arrays will be included on the pitched roofs for renewable energy generation.
- 6.22. In relation to proposed building 3, an entrance canopy has been included to shelter the multi-use social space, as applied to the guest residential building, and the flat roof with parapet walls mimics the main building. This proposed location of this building close to the campsite improves safeguarding of children within the large site (with lake), especially at night when external lighting is to be controlled to a minimum to avoid polluting the relative dark sky over the nature reserve.
- 6.23. Furthermore, through consultation with the client, a layout has been achieved that provides diversity to the use of these facilities. Toilets are separated from the showers to maximise use and allow for cleaning operations to keep facilities available. Sub-division of the facilities is possible internally to enable use by different school groups. This allows the client to respond to differing needs of their customers.
- 6.24. After careful consideration, it has been decided that the external walls of the proposed development will utilise planks configured vertically, with pitched roofs having shingles (rectangular timber ‘tiles’). These will form part of a breathing fabric with high levels of thermal insulation to ensure heat loss is minimised. A variety of timber plank widths is being considered within bays on each façade to create rhythm and interest to the natural material. A selection of example images can be viewed on page 110 in the supporting DAS.
- 6.25. These new proposals will comply with access requirements defined in the Building Regulations (Part M) that support the Equality Act. For instance, dedicated fully accessible changing rooms with shower and toilet are included with each of the changing areas on lower ground and upper ground. These facilities are provided with level access and the sanitary fittings defined in Building Regulations Part M, known as a Doc M Pack, which include grab rails and shower seat. Within the lower ground changing rooms, the showers include an accessible provision that includes the same Doc M Pack fittings to allow inclusion. Wheelchair users will be provided with a single changing room that has been sized to suit an accessible provision.
- 6.26. In addition to the design of the proposed buildings, enhancing the landscape to improve ecology was also carefully considered during the design stage of the proposal. Therefore, A Landscape Masterplan (Ref: PR-200-PEV-XX-XX-DR-L-00200) and a Landscape Planting Strategy (Ref: PR-200-PEV-XX-XX-DR-L-00201) have been prepared by Pick Everard to support this application and exhibit the proposed soft and hard landscaping. The soft landscaping planting strategy for TYM has been developed in collaboration with the project ecologist with the primary aim of creating a landscape on site that respects the existing habitats, biodiversity, and the wider MOL. As such, a recommended species list was established to achieve a net gain of biodiversity on site.
- 6.27. Native and wildlife attracting species are proposed in key locations on site, such as the southern boundary grassland to the south of the access road, to serve as an extension of the Ham Lands meadow, boundary conditions enhanced with additional native, species-rich hedgerow planting and scattered tree planting within areas of existing grassland. The focus will be on habitat creation and improving connections to the wider Ham Lands and regional green infrastructure. This accords with Policy LP16 of the Richmond Local Plan which requires development proposals to protect and enhance existing trees, shrubs, and other areas of vegetation that are deemed of landscape significance.

- 6.28. Therefore, it is evident that the proposed developments across the site would have a positive impact on the site and surround area. Moreover, the proposal would be in accordance with Policy LP1, LP2, LP20, and LP22 of the Richmond Council Local Plan D4 and D5 of the London Plan. The proposal also accords with the Design Quality SPD.

Staff Accommodation

- 6.29. Currently there are two single storey residential accommodation units on site which are occupied by SOLD staff. These staff remain permanently on site as part of their employment to assist with overseeing and ensuring the site remains secure.
- 6.30. The proposals seek to replace these units with a single 3-bedroom apartment at 1st floor level of the main building for a permanent member of staff. Earlier iterations of the plans identified two residential units but because of feedback from Richmond Council around the impact on MOL this was reduced to a single residential unit. This is considered to be the minimum to enable SOLD to keep to site secure 24 hours a day.
- 6.31. It should be noted that the staff accommodation unit will be tied accommodation to the TYM site and can only be occupied by an SCC employee as part of their employment. The unit will not be made available on the open market for sale or for rent as it remains a key part of SOLD's operation of the TYM site.

Ecology

- 6.32. Due to the sensitive nature of the sites location, several ecological policies are served under this section of the planning statement. Policy GG2 of the London Plan seeks to ensure development proposals achieve a biodiversity net gain where possible. Policy GG3 take this further by outlining that development proposals should be incorporating green infrastructure. Policy G6 relates directly to biodiversity and states development proposals should manage impacts on biodiversity and aim to secure biodiversity net gain.
- 6.33. Policy LP13 of the Richmond Local Plan relates MOL and states this area will be protected and retained in predominately open use. Policy LP13 goes further stating appropriate uses within MOL include public and private open spaces and playing fields, open recreation and sport, biodiversity including rivers and bodies of water. Policy LP15 directly relates to biodiversity stating the Council will protect and enhance the boroughs biodiversity through the creation and retention of key habitats. Policy LP18 is also relevant to this section. To ensure the development accords with the policies listed, a number of supporting documents have been produced and summarised below.
- 6.34. In February 2022, Pick Everard commissioned Middlemarch Environmental Ltd to undertake an ecological walkover survey at the TYM site. The purpose of this assessment is to inform the Biodiversity Net Gain Assessment associated with the proposed redevelopment of the site to create new guest accommodation, staff residences and associated facilities. Furthermore, a Preliminary Ecological Appraisal has previously been undertaken by Surrey Wildlife Trust Ecology Services in November 2020.
- 6.35. A Preliminary Bat Roosting Assessment and a follow-up emergence survey has been prepared by Middlemarch Environmental Ltd to support this application. The assessment identified a series of potential features, which could be utilised by roosting bats within the existing buildings on site. The emergence survey did not identify any bats entering the existing buildings but did note a number of bats using the wider landscape for foraging/commuting. It has been advised that the

survey is valid for 12 months and therefore a follow-up survey would be required if demolition were to take place beyond this time period.

- 6.36. A Badger Survey has also been undertaken by Middlemarch Environmental Ltd, dated April 2022, to support this application. The survey found that the application site is considered to offer suitable foraging, commuting and sett building habitat for badgers. It is well connected with Ham Lands Local Nature Reserve which provides further suitable habitat for badgers. As such, a sett comprising five connected burrows was identified at the site's northern extent. Badger monitoring surveys recorded badger activity in three of the five holes, with further evidence of badger activity, including snuffle holes, latrines and push throughs found throughout the site. A maximum of two individual badgers were recorded on trial cameras installed around the sett during the monitoring period.
- 6.37. The survey highlights that if any vegetation clearance or development is proposed within a section of overgrown vegetation in the north-western portion of the site, a further badger survey is undertaken to establish the presence/absence of a sett. This will require sensitive vegetation clearance to provide access.
- 6.38. The identified active badger sett (sett 2) is located outside of the immediate proposed development footprint. As such it is considered unlikely to sustain loss/damage as a direct result of the proposed works. The supporting report concludes, *'that the proposed development is unlikely to result in a breach of the associated legislation if appropriate mitigation is implemented, due to the active badger sett (sett 2) being located beyond the footprint of the proposed development.'*
- 6.39. To ensure the proposal accords with ecology/biodiversity policies outlined in the relevant development plans, a Biodiversity Net Gain Assessment has been prepared by Middlemarch Environmental Ltd, dated October 2022, to support this application. To summarise:
- The existing value of the habitats on-site is 25.48 Biodiversity Units (BU). The proposals (habitat loss, creation, and enhancement) will deliver a net gain of +4.17 Habitat BU, a +16.37% increase relative to baseline habitat value.
 - The existing value of the hedgerows on site is 0.14 BU. The proposals (habitat loss and retention) will deliver a net gain of +1.02 Hedgerow BU, a >100% increase in the baseline hedgerow value.
- 6.40. As outlined above, the redevelopment of the TYM will result in a biodiversity net gain for the site and is therefore in line with policies GG2 and G6 of the London Plan and policy LP15 of the Richmond Local Plan.
- 6.41. The supporting assessment recommends that a HEMP should be produced for all habitat features proposed within the site.
- 6.42. The supporting reports summarised in this section have outlined that the proposed development accords with the relevant policies in the London Plan and Richmond Local Plan.

Trees

- 6.43. An Arboricultural Impact Assessment (AIA) has been prepared by Middlemarch Environmental Ltd, dated April 2022, to support the redevelopment of the TYM site.

- 6.44. Policy G7 of the London Plan relates to trees and woodlands and states development proposals should ensure that, wherever possible, existing trees of value are retained. Policy LP16 of the Richmond Local Plan also requires the protection of existing trees and the provision of new trees, shrubs, and other vegetation of landscape significance.
- 6.45. Thirty-six individual trees, nineteen groups of trees and two hedgerows were surveyed as part of the Preliminary Arboricultural Assessment. The site supports a diverse range of planted tree specimens as well as self-seeded and closed-canopy tree cover which offered a range of arboricultural and conservation value to the site. The site contains three high value English Oak trees located on the southern site boundary. These specimens (T21, T22, T24) were considered noteworthy and as such, Retention Category A trees. All three trees presented good structure and vigour, with only a small number of noted defects which include – minor deadwood, pruning wounds and historic branch stubs.
- 6.46. Fifteen individual trees and seven groups of trees assessed on site exhibited moderate value and were categorised as ‘Retention Category B’. These trees presented good retention value due to their arboricultural and landscape qualities which are likely to continue for at least 20 years. Tree groups G7 and G10 were particularly prominent as together they provide tangible arboricultural and cultural value which is clearly visible through the presence of a sustainable and well-managed forest school located within these areas.
- 6.47. The proposed development has been designed so that, where possible, existing trees are retained, however, to accommodate the proposed development, it will be necessary to partially remove one group. The trees to be removed are detailed within the table below and are identified on the Tree Retention Plan.

Group Reference	Species	Retention Category	Reason for Removal
G8	Bird Cherry / Wild Cherry	B	Entrance Widening

- 6.48. The partial removal of one group (G8) is to facilitate the widening of the existing entrance, this group was located behind an outgrown hedgerow and its loss is unlikely to result in an impact to the visual amenity of Richmond Drive. The partial loss of tree group G8 should not cause objection as new planting and management of the site can provide suitable mitigation.
- 6.49. As aforementioned in the Design Section of this Planning Statement, Pick Everard have prepared a Landscaping Planting Strategy and Landscape Masterplan. Only a small section of vegetation is proposed to be removed towards the existing vehicle access along Riverside Drive. The design process for the development has made a real effort to ensure the proposed soft and hard landscaping enhance and respect the setting of the MOL. Furthermore, additional tree planting, hedgerows and shrub planting, along with opportunities for green roofs supplement the broader ecological strategy and will achieve a net gain for biodiversity for the site.
- 6.50. As such, the proposed development is therefore in line with Policy G7 of the London Plan and Policy LP16 of the Richmond Local Plan as the proposal seeks to retain as many existing trees as possible, whilst enhancing the provision of trees located on the site.

Transport / Highways

- 6.51. A Transport Statement (TS) has been prepared by Pick Everard to support this application, dated 3rd October 2022. This supporting statement has been produced in order to provide information regarding the current transport situation at the site and the likely impacts of the proposed development. The site is classed as Sui Generis site and does not fall within a standard planning use class.
- 6.52. Policy S5 of the London Plan highlights that sports and recreational facilities should be well-connected to public transport, walking, and cycling networks. Additionally, Policy T1 takes this further by stating developments should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking, and cycling routes. Policy T4 requires development proposals to produce a Transport Statement to demonstrate that proposals will not adversely impact on the capacity of the transport network. Policy T5 outlines the cycle parking provision expected depending on the planning class of the proposal. Policy T6.5 outlines the non-residential disabled parking provision for developments.
- 6.53. Policy LP44 of the Richmond Local Plan highlights the Council is committed to promoting safe, sustainable, and accessible transport solutions. Policy
- 6.54. The nearest bus stop is approximately 800m from the site, which equates to a 10-minute walk. This distance can be considered feasible and acceptable for some users of the site, despite the PTAL score of 0. This bus stop runs services between Kingston Upon Thames and North Sheen, 24 hours a day, 7 days a week
- 6.55. Access to the application site will retained off Riverside Drive, where there is proposed to be a new pedestrian crushed gravel path along the northern edge of the access road. Existing Parking Facilities and On-Site Drop off/Pick Up Management is outlined under section 3.4 of the supporting TS.
- 6.56. The number of visitors will remain similar in quantum on a daily basis at around a maximum of 240 people following the redevelopment works to cater for year-round residential stays. The peak attendance of residential stays will happen during the warmer months and will reduce during the colder months with the closure of the Teepee accommodation where will be sole use of the residential blocks for overnight accommodation. Additionally, during the school term, children arrive by coach or minibus, and this keeps the number of vehicles on the site to a minimum. The peak period of vehicles on site is during the school holidays and at the large-scale events (twice a year). These arrangements are not proposed to change as part of the site changes.
- 6.57. The TS has demonstrated that the majority of the start and end of the daily activities and residential stays do not encroach on peak times on the immediate highway network. All parking, drop off and servicing operations are to continue to take place on the site and so will not encroach on the local area and highway network.
- 6.58. It is proposed to provide approximately a like for like scenario of 18 marked vehicle parking spaces for staff plus 2 spaces for disabled users (6%) for staff and visitors. A total of 5 of these spaces (20%) will provide electric vehicle charging points and 5 spaces (20%) will provide infrastructure to install electric charging points in the future.
- 6.59. The existing site provides no official cycle parking facilities on site. The redevelopment of the site will provide 20 covered cycle spaces (10 Sheffield stands) for staff and visitors. Additionally, the

use of the cycle stands on site can be increased should there be a demand for either staff or visitors.

- 6.60. A Travel Plan (TP) has also been produced by Pick Everard, dated 29th September, to support this application and inform staff, visitors and associations attending the site to consider travelling sustainably by public bus services or in an organised bus/coach, to reduce the number of single occupancy car travel where possible and therefore increase the number of sustainable trips to site. This document will be updated following planning approval.
- 6.61. In addition to the TS and TP, an Outline Construction Management Plan has also been produced to support this application. This document has been prepared by Pick Everard, dated 29th September 2022, to support this application. The supporting plan outlines that there is no conflict with other planning applications within proximity to the site and all construction vehicles will be able to access the site safely. Construction will take place in a single phase to achieve the quickest construction period and SOLD will continue to operate from the site during this period. This document will be updated following planning approval to confirm relevant details and any changes, following the appointment of a contractor.
- 6.62. In summary, the supporting transport information supporting this application has demonstrated the redevelopment of the TYM site will significantly improve its current functions, with improved vehicle parking, accessibility, designated delivery vehicle and waste collection locations, cycle parking and to modernise the site as a whole to continue running as an important teaching hub and educational site, whilst adhering to MOL to retain as much existing green area as possible.
- 6.63. Therefore, the proposed redevelopment of the TYM site is in line with Policy S5, T1, T4, T5, and T6.5 of the London Plan and Policies LP44 and LP45 of the Richmond Local Plan. The proposal also provides adequate parking provision in accordance with the Transport SPD.

Energy and Sustainability

- 6.64. As previously at the heart of the NPPF there is a presumption in favour of sustainable development (para 8). Policy LP22 of the Richmond Local Plan states that new non-residential buildings over 1,000 sqm will be required to meet BREEAM 'Excellent'. The supporting Sustainable Construction Checklist SPD further outlines that new non-residential buildings over 1,000 sqm will be required to BREEAM Preliminary Assessment.
- 6.65. The current pre-assessment shows a score of 70.03.% demonstrating that the BREEAM rating of 'Excellent' can be achieved as well as all the mandatory credits to achieve the 'Excellent' rating. This score is based upon the current evidence provided and should be considered an estimate at this stage.
- 6.66. Pitched roofs will host the solar thermal and photovoltaic (PV) arrays generating renewable energy for use on the site and contribute towards the net zero carbon target. PV systems that set the face of the panels flush with the adjacent roof surface are intended to minimise the visual clutter often associated with retrofitted solutions.
- 6.67. As highlighted in the Design Section of this Planning Statement, the flat roof of the Main Building will incorporate an ASHPs. These are proposed as a replacement to the current gas boilers on site and significantly improve on the level of carbon reduction on site. Flat roofs to the other buildings will be covered by extensive green or self-seeding biodiverse roof treatments to create additional habitats to those existing at ground level or within mature trees. These roofscapes will define new

habitats to additional species, based on the recommendations made by the ecologist, and help in creating food sources for birds and bats foraging around the site.

- 6.68. In relation to material sourcing, specifications will define a requirement for materials to be responsibly sourced, ideally from UK manufacturers. This will be benchmarked to the requirements defined by the BREEAM criteria for respective elements, to ensure alignment with the Excellent rating.

Drainage / Flooding

- 6.69. A Drainage Strategy has been prepared Atkins, dated 11th October 2022, to support this application. The supporting report presents the surface and foul water drainage strategy for the redevelopment of TYM by providing details on the proposed surface and foul water networks, demonstrating how the use of Sustainable Urban Drainage System (SuDS) have been adopted to reduce flood risk and promote biodiversity benefits as well as improve water quality and amenity value. The section will summarise these details and outline how the development accords with the relevant policies.
- 6.70. Policy G5 of the London Plan relates to urban greening and requires developments to incorporate nature-based sustainable drainage. Policy SI15 relates directly to sustainable drainage and requires developments provide sustainable drainage systems to prevent surface water flooding and such systems should follow the drainage hierarchy and should aim to achieve greenfield run off rates. Policy LP21 of the Richmond Local Plan states that all development proposals must minimise the risks of flooding. Policy LP21 goes further stating the Council will require the use of SuDS in all development proposals. Policy E4 of the Ham and Petersham Neighbourhood Plan also highlights that all new buildings will be expected to include a sustainable drainage system to dispose of water. Applicants will also be required to demonstrate that their proposal complies with listed flood defence requirements.
- 6.71. The surface water discharge for the site will be via both a below ground infiltration system and a positive outfall to the lake. The roof run-off is collected and infiltrated into the ground at the south-western side of the site, where the infiltration characteristics of the soil has been identified as suitable. Surface run-off from the roofs, roads and car park will be attenuated in a pond before discharging into the lake.
- 6.72. The supporting Drainage Strategy outlines a SuDS Appraisal, which has identified several sustainable methods of drainage that have been incorporated into the design of proposed buildings at TYM. The accompanying report has outlined the SuDS most appropriate for use on site and these include infiltration tanks, filter trench, detention basin, green roofs, and permeable paving. This appraisal ensures that the proposed development accords with policies SI15 and G5 of the London Plan and policy LP21 of the Richmond Local Plan.
- 6.73. Additionally, the site is designed to ensure that no overland flooding from the site occurs during the 1 in 100 year + 40% CC storm event. This is achieved using a below ground infiltration tank to the south-west of the site, and an attenuation pond to the east. The tank is kept at least 5m away from the building. The runoff from the parking areas, access road, footways and roof area pass through a rain garden, permeable paving, and an attenuation pond before discharging into the lake. Importantly, amenity and biodiversity benefits can also be enhanced by the implementation of SuDS. A summary of these benefits can be viewed in the supporting Drainage Report.

- 6.74. Therefore, the supporting report and the proposed incorporation of a variety of SuDS ensures the development is in line with the relevant policies outlined above. The integration of these SuDS will also result in several ecological benefits for the site such as the incorporation of a pond to boost wildlife on site.

Noise

- 6.75. An Environmental Noise Impact Assessment has been prepared by Acoustic Design Technology Ltd, dated 7th October 2022, to support this application.
- 6.76. Policy D14 of the London Plan requires developments to adequately mitigate noise to improve the health and quality of life for residential uses. This policy is served due to residential dwellings being situated across the other side of the river Thames. Policy LP10 of the Richmond Local Plan is also relevant to this section.
- 6.77. The supporting assessment highlights that potential environmental noise emissions from an outdoor educational facility will include noise breakout from internal activities, outdoor play activities and fixed plant installations. Outdoor activities inevitably generate noise, and this will be audible in the surrounding area. Therefore, an environmental noise survey was undertaken on site 29th September 2022.
- 6.78. Unlike the external activities that will be taking place on the site, internal teaching activities will not produce noise to be noticeable at more than a few metres away from the building. The assessment highlights that the proposed main building is circa. 180m from the closest residential dwelling. As such, there would be unlikely to be any significant environmental noise impact from internal activities.
- 6.79. The report identifies not only is there existing noise generated from SOLD's existing operations, there are also multiple other noise sources in the surrounding area generated by multiple sports pitches, the gun range, activity along the Thames Path and commercial activity along the Thames. As a consequent noise from any additional activity noise would not be out of character. It is therefore reasonable to conclude that, although the noise may be occasionally audible, the impact of the proposal would be minimal. According to the planning guidance, this should equate to 'no observed adverse effect'.
- 6.80. As such, the proposed development is in accordance with Policies D14 of the London Plan and LP10 of the Richmond Local Plan.

Fire

- 6.81. A Fire Statement has been prepared by Osborn Associates Ltd, dated 30th September 2022. The London Plan has introduced two policies relating to fire safety, Policy D5 and D12. Policy D5, as outlined under previous sub-headings, outlines the design requirements for new developments to achieve good and inclusive design. Policy D12 directly relates to fire safety and sets the requirements for all developments to achieve the highest standards of fire safety.
- 6.82. To ensure the design of the proposed buildings on the TYM accord with Policies D5 and D12, the following design features have been incorporated into the development: escape provisions, evacuation lifts provision, fire service access and facilities including stair protection, external fire spread and internal compartmentation requirements.

- 6.83. To ensure the proposed buildings accord with the policies listed above, special fire hazard areas (such as boiler rooms, storage spaces for fuels, chemicals and other highly flammable substances, oil-filled transformer and switchgear rooms and rooms housing a fixed combustion engine) will be enclosed in 30 minutes fire resisting construction. Additionally, the residential area will be separated from non-residential areas by fire resisting construction achieving 60 minutes fire resistance.
- 6.84. The supporting Fire Statement has outlined how the proposed development accords with the criterion of Policy D12. Therefore, the proposed development accords with Policy D5 and D12 of the London Plan.

Community Engagement

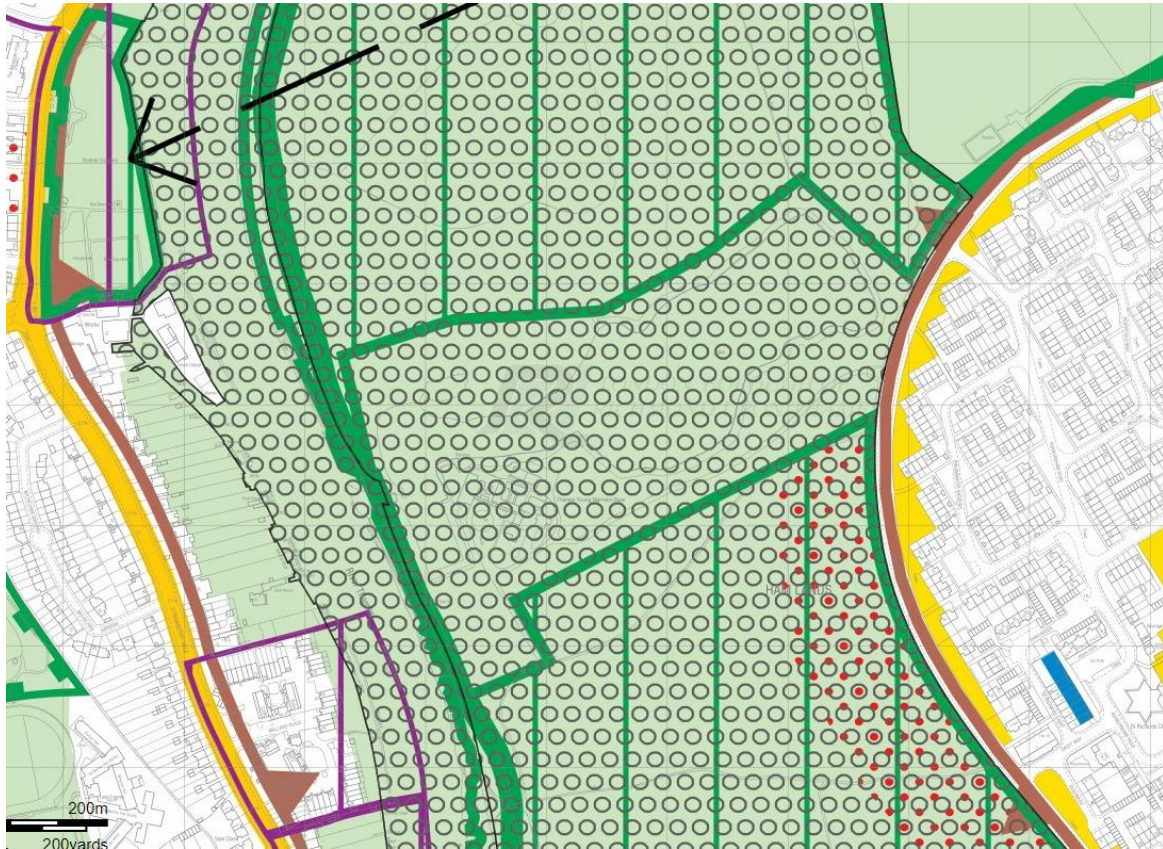
- 6.85. A Community Engagement Statement has been prepared by SCC to outline the steps undertaken by SOLD to engage the local community in respect to the proposed redevelopment of the TYM site. To publicise the consultation, 2,384 addresses were sent invitations informing them of the consultation and how they could participate.
- 6.86. To showcase the proposals to the community, the Applicant put a display up in the main building at Thames Young Mariners. This was available to view to the public on Tuesday 26th April and Saturday 30th April. A total of nine A2 boards were used to showcase the proposals and attendees were invited to fill out feedback forms so they could express their likes/concerns in relation to the proposal. In addition to the face-to-face exhibition, a website was made available to those who couldn't attend and went live 11th April. This website contained all the materials shown at the exhibition and an outline feedback form. The website remains live so residents can still access project information.
- 6.87. In total, 126 feedback forms were submitted either in person or online. 99% either supported or strongly supported the proposals for TYM, 89% either supported or strongly supported the design principles and site arrangement proposed and 91% either supported or strongly supported the initial details on the approach of replacing the buildings at TYM and supporting outdoor activity equipment/facilities.
- 6.88. Following the consultation on the proposed redevelopment, several questions were raised and SOLD were able to respond to these queries via the webpage. These response comments can be viewed under Section 4.5 of the supporting statement. SOLD will continue to engage with stakeholders following the submission of this application and respond to questions from the public.
- 6.89. The supporting Community Engagement has clearly demonstrated that SOLD has taken a comprehensive approach to engaging with the community via a hybrid consultation strategy across multiple platforms, ensuring those who wanted to voice their views could do so. As such, the accompanying statement has demonstrated that proposal has been effectively presented to the public.

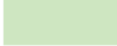


7 Conclusion

- 7.1. The application site known as Thames Young Mariners lies within the boundary of the London Borough of Richmond Upon Thames. The proposal seeks the *'redevelopment and demolition of the existing outdoor learning buildings and development of replacement outdoor learning buildings, associated residential accommodation, changing block, replacement staff accommodation unit and outdoor activity equipment including high ropes, climbing wall, coasteering course, supporting pontoons with associated landscaping enhancements and parking.'*
- 7.2. The site is owned and operated by Surrey County Council but is used by schools, community groups, colleges and families from Richmond, Surrey and other London Boroughs.
- 7.3. This planning statement has been prepared alongside a suite of technical documentation to enable the proposals to be assessed against national, London, local and neighbourhood planning policy. The reports and plans which support the application clearly demonstrate the proposals' compliance with relevant planning policy and the significant number of benefits the proposed development will generate over and above the existing buildings and operations on site.
- 7.4. The proposals have been carefully designed and considered, taking a landscape-led approach to ensure the development retains the site's character whilst ensuring the development will deliver sustainable, fit for purpose buildings which will enable SOLD to continue operating in the long term. The proposal will also deliver new and improved habitats on the site which will create a biodiversity net gain. The proposed will also deliver significant improvements in carbon reduction, energy efficiency and overall sustainability in line with policy requirements.
- 7.5. When the proposals are considered as a whole, it can be seen that the proposals have not only demonstrated very special circumstances to allow new development in MOL but also remain in compliance with relevant planning policies and will not give rise to any unacceptable levels of harm subject to the proposed mitigation included within the report's recommendations.
- 7.6. The proposed development will enable SOLD to continue providing an important element of social infrastructure to support schools, colleges, community groups and families with outdoor learning and education within Richmond, whilst also supporting Surrey and other London Boroughs. The development will also allow SOLD to extend their residential offering to a year-round basis, rather than a current summer seasonal offer, enhancing the variety of facilities SOLD can offer to the community.
- 7.7. The proposed development will provide highly efficient sustainable buildings which are fully accessible and have been sensitively designed to be fully inclusive with accessible provision being fully integrated into the design which will significantly improve how SOLD can offer both day visits and overnight stays to those with learning or physical needs compared to existing facilities.
- 7.8. We believe that our Planning Statement and the supporting evidence base documents demonstrate that the proposals are in accordance with policies set out in the NPPF, London Plan, Richmond Plan and Ham and Petersham Neighbourhood Plan.

Appendix 1

Local Plan Proposals Map Extract



-  Metropolitan Open Land
DM OS 2
-  Other Site of Nature Importance
CP 4
-  Thames Policy Area
DM OS 11

Area at risk from flooding
Please check with the Environment
Agency at: [www.environment-
agency.gov.uk](http://www.environment-agency.gov.uk)

Archaeological Priority Areas
[DM HD 4 and Map 1 of DMP](#); please
check with English Heritage at
www.english-heritage.org.uk for latest
information

Appendix 2

Thames Young Mariners Policy Section

NPPF – Adopted June 2021

The NPPF (2021) sets out the Government’s planning policies for England and identifies that the purpose for the planning system is to contribute to the achievement of sustainable development.

Paragraph 8 of the NPPF details the three dimensions of sustainable development which are as follows:

- **An economic role** – 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;
- **A social role** – 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 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
- **An environmental role** – 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.

Paragraph 10 states that at the heart of the NPPF is a presumption *“in favour of sustainable development”*.

Section 6 relates to building a strong competitive economy with paragraph 81 states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

Paragraph 83 states planning policies and decisions should recognise and address the specific locational requirements of different sectors.

Section 8 relates to promoting healthy and safe communities with paragraph 92 stating planning policies and decisions should aim to achieve healthy, inclusive and safe places which... *“enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.”*

Paragraph 93 goes further stating to provide social, recreational, and cultural facilities and services the community needs, planning policies and decisions should... *“guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs.”*

Paragraph 98 states access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and wellbeing of communities and can deliver a wider benefits for nature and support efforts to address climate change.

Paragraph 103 of the NPPF states that development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes and paragraph 109 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Paragraph 119 highlights that planning decisions should promote an effective use of land in meeting the need for homes and other uses. Paragraph 120 takes this further stating that planning decision should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities for remediate despoiled, degraded, derelict, contaminated or unstable land. It also encourages the use of land for multiple benefits including through mixed use schemes.

Paragraph 124 highlights the importance of good design as a key aspect of sustainable development, with paragraph 127 highlighting the key elements to achieve good design and sustainable development.

Paragraph 130 seeks to ensure that developments will function well and add to the overall quality of the area not just for the short term but over the lifetime of the development, whilst not preventing or discouraging appropriate innovation or change.

Paragraph 132 also states, *“design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.”*

Section 13 relates to protecting Green Belt land with paragraph 147 stating, *‘Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.’*

Paragraph 148 states, *‘when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.’*

Paragraph 149 states, *‘a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are... the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport and outdoor recreation; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.’*

Section 14 relates to meeting the challenge of climate change, flooding, and coastal change. Paragraph 152 states, *“the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve*

resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.”

Paragraph 154 states, *“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.”*

Paragraph 167 states *“When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:*

- a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;*
- b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;*
- c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;*
- d) any residual risk can be safely managed; and*
- e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.*

Chapter 15 relates to conserving and enhancing the natural environment with paragraph 174 stating, *“planning policies and decisions should contribute to and enhance the natural and local environment by... minimising impacts on and providing net gains for biodiversity... preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air quality.”*

Policy 180 relates to habitats and biodiversity and states, *“when determining planning applications, local planning authorities should apply the following principles... if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.”*

Paragraph 182 states, *“the presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.”*

Paragraph 183 states, planning policies and decisions should ensure that... *“a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination.”*

Paragraph 185 states, *“planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from development.”*

Section 16 relates to conserving and enhancing the historic environment with paragraph 194 stating, *“where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.”*

The London Plan – Adopted March 2021

The London Plan is an integrated Policy Framework and must be read as a whole. The London plan runs from 2019 to 2041. This date has been chosen to provide a longer-term view of London’s development to inform decision making.

Policy GG1 relates to building strong and inclusive communities, seeking to ensure that London continues to generate a wide range of economic and other opportunities, and that everyone can benefit from these to ensure that London is a fairer, more inclusive, and more equal city.

Policy GG2 relates to making the best use of land through mixed use places and encourages the enablement off the development of brownfield land. Furthermore, development proposals must protect and enhance London’s open spaces, including the metropolitan open land and promote the creation of green infrastructure and urban greening, including aiming to secure net biodiversity gains where possible.

Policy GG3 relates to creating a healthy city and encourages development proposals to plan for improved access to and quality of green spaces, the provision of new green infrastructure, and spaces for play, recreation and sports. Furthermore, those in planning and development should:

... B) promote more active and healthy lives for all Londoners and enable them to make healthy choice;

D) assess the potential impacts of development proposals and Development Plans on the mental and physical health and wellbeing of communities, in order to mitigate any potential negative impacts, maximise potential positive impacts, and help reduce health inequalities, for example through the use of Health Impact Assessments;

G) plan for improved access to and quality of green spaces, the provision of new green infrastructure, and spaces for play, recreation and sports.’

Policy GG6 relates to increasing efficiency and resilience and aims to ensure buildings and infrastructure are designed to adapt to a changing climate, making efficient use of water, reducing impacts from natural hazards like flooding and heatwaves, while mitigating and avoiding contributing to the urban heat island effect.

Policy D3 relates to optimising site capacity through the design-led approach and states all development must make the best use of land by following a design-led approach that optimises the capacity of sites. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site’s context and capacity for growth, and existing and planned supporting infrastructure capacity.

Policy D4 relates to delivering good design and Part F states the quality of development should be retained through to completion by:

5) ensuring maximum detail appropriate for the design stage is provided to avoid the need for later design amendments and to ensure scheme quality is not adversely affected by later

decisions on construction, materials, landscaping details or minor alterations to layout or form of the development

- 6) ensuring the wording of the planning permission, and associated conditions and legal agreement, provide clarity regarding the quality of design*
- 7) avoiding deferring the assessment of the design quality of large elements of a development to the consideration of a planning condition or referred matter*
- 8) local planning authorities considering conditioning the ongoing involvement of the original design team to monitor the design quality of a development through to completion.*

Policy D5 relates to inclusive design and requires development proposals to achieve the highest standards of accessibility for all and highlights that developments should be people focused, convenient and welcoming, allowing them to be entered, used and existed safely, easily and with dignity for all.

Policy D11 relates to safety security and resilience to emergency it requires development proposals maximise building resilience relation to fire flood and other hazards and be designed to minimise crime in proportion to the risk.

Policy D12 relates to fire safety and states to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety and ensure that they provide suitable and convenient means of escape and associated evacuation strategy for all building users.

Policy D14 relates to noise and requires developments to adequately mitigate noise to improve health and quality of life for residential uses whilst separating new noise sensitive development from major noise generating uses such as road rail or air transport and some types of industrial.

Policy S1 relates to developing London's social infrastructure and states development proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies should be supported.

Policy S3 relates to education and childcare facilities and states development proposals should be accessible and inclusive for a range of users, including disabled people, by adopting an inclusive design approach.

Policy S4 relates to Play and Informal Recreation and states developments proposals should increase opportunities for play and informal recreation and enable children and young people to be independently mobile.

Policy S5 relates to sports and recreational facilities and states development proposals should increase or enhance the provision of facilities in accessible locations, well-connected to public transport and link to networks for walking and cycling.

Policy G1 relates to green infrastructure and states London's network of green and open spaces, and green features in the built environment, should be protected and enhanced. Green infrastructure should be planned, designed, and managed in an integrated way to achieve multiple benefits.

Policy G3 relates to Metropolitan Open Land (MOL) and states the MOL is afforded the same status and level of protection as the Green Belt. The MOL should be protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt and boroughs should work with partners to enhance the quality and range of uses of MOL.

Policy G4 relates to open space and states development proposals should not result in the loss of protected open space.

Policy G5 relates to Urban Greening and states development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.

Policy G6 relates to biodiversity and access to nature and states development proposals should manage impacts on biodiversity and aim to secure biodiversity net gain. This should be informed by the best available ecological information by the best available ecological information and addressed from the start of the development process.

Policy G7 relates to trees and woodlands and states development proposals should ensure that, wherever possible, existing trees of value are retained.

Policy SI 1 relates to air quality and requires that developments should not lead to further deterioration of the existing poor air quality or create areas which exceed air quality limits or will create unacceptable risks of exposure to poor air quality.

Policy SI 2 relates to minimising greenhouse gas emissions and states a minimum on-site of at least 35% beyond building regulations is required for major development.

Policy SI 3 relates to energy and infrastructure and states that boroughs and developers should engage at an early stage with relevant energy companies and bodies to establish the future energy and infrastructure requirements arising from large-scale development proposals such as Opportunity Areas, Town Centres, other growth areas or clusters of significant new development. Large Scale developments must incorporate Energy Masterplans.

Policy SI 4 relates to managing heat risk and states development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure.

Policy SI 5 relates to water infrastructure and states in order to minimise the use of mains water, water supplies and resources should be protected and conserved in a sustainable manner.

Policy SI 12 relates to flood risk management and states development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses. Natural flood management methods should be employed in development proposals due to their multiple benefits including increasing flood storage and creating recreational areas and habitats.

Policy SI 13 relates to sustainable drainage and request that developments provide sustainable drainage systems to prevent surface water flooding and such systems should follow the drainage hierarchy and should aim to achieve greenfield run off rates.

Policy SI 14 relates to waterways – strategic role and states development proposals should address the strategic importance of London’s network of linked waterways, including the River Thames, and should seek to maximise their multifunctional social, economic and environmental benefits.

Policy SI 16 relates to waterways – use and enjoyment and states development proposals should protect and enhance, where possible, water-related cultural, educational and community facilities and events,

and new facilities should be supported and promoted, but should take into consideration the protection and other uses of the waterways. Development proposals that increase the provision of water sport centres and associated new infrastructure will be supported if a deficit in provision has been identified locally, and if the infrastructure does not negatively impact on navigation or on the protection of the waterway.

Policy T1 relates to strategic approach to transport and states all development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London’s transport networks and supporting infrastructure are mitigated.

Policy T4 relates to assessing and mitigating transport impacts and requires developments to provide transport assessments or statements which demonstrate that the development will not adversely impact on the capacity of the transport network. This should include measures to mitigate any adverse impacts and should also make reference to encouraging sustainable transport through travel plans as well as considering the operational and construction phases of the development through construction logistics plans and delivery and servicing plans.

Policy T5 relates to cycling and states cycling parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards. Development proposals should demonstrate how cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people.

Sui generis	As per most relevant other standard e.g. casino and theatre = D2, room in large-scale purpose-built shared living = studio C3
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Policy T6 relates to car parking and states car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking (‘car-lite’).

Policy T6.5 relates to non-residential disabled persons parking and states disabled persons parking should be provided in accordance with the levels set out in Table 10.6, ensuring that all non-residential elements should provide access to at least one on or off-street disabled parking bays.

Use	Designated bays (Per cent of total parking provision)	Enlarged bays (Per cent of total parking provision)
Workplace	5 per cent	5 per cent
Education	5 per cent	5 per cent
Retail, recreation, hotels and leisure	6 per cent	4 per cent
Transport car parks	5 per cent	5 per cent
Medical and health facilities	6 per cent	4 per cent
Religious buildings and crematoria	Minimum two spaces or 6 per cent, whichever is the greater	4 per cent
Sports facilities	Refer to Sport England Guidance	Refer to Sport England Guidance

Policy T7 relates to deliveries servicing and construction requires developments to consider these elements of the development through the use of a construction logistics plan and a deliveries and servicing plan.

Richmond Local Plan – Adopted July 2018

The Richmond Local Plan will set out policies and guidance for the development of the borough over the next 15 years. The Local Plan covers a plan period to 2033 and identifies where the main developments will take place, and how places within the borough will change, or be protected from change, over that period.

Policy LP 1 (Local Character and Design Quality) states the Council will require all development to be of high architectural and urban design quality. To ensure development respects, contributes to and enhances the local environment and character, proposals will be assessed against a number of design principles listed in the policy.

Policy LP 2 (Building Heights) highlights that the council will require new buildings to respect and strengthen the setting of the borough's valued townscapes and landscapes, through appropriate building heights, by following the principles listed in the policy.

Policy LP 7 (Archaeology) states the Council will seek to protect, enhance and promote its archaeological heritage (both above and below ground), and will encourage its interpretation and presentation to the public. It will take the necessary measures required to safeguard the archaeological remains found, and refuse planning permission where proposals would adversely affect archaeological remains or their setting.

Policy LP 8 (Amenity and Living Conditions) states all development will be required to protect the immunity and living conditions for occupants of new, existing, adjoining and neighbouring properties. Applicants are expected to have regard to the guidance set out with the Council's SPD's relating to design.

Policy LP 9 (Floodlighting) states floodlighting, including alterations and extensions, of sports pitches, courts and historic and other architectural features will be permitted unless there is demonstrable harm to character, biodiversity or amenity and living conditions. Several criteria, which is listed in the policy, will need to be considered when proposing development that includes floodlighting.

Policy LP 10 (Local Environmental Impacts and Land Contamination) states the Council will seek to ensure that local environmental impacts of all development proposals do not lead to detrimental effects on the health, safety and the amenity of existing and new users or occupiers of the development site, or the surrounding land. These potential impacts can include, but are not limited to, air pollution, noise and vibration, light pollution, odours and fumes, solar glare, and solar dazzle as well as land contamination. Furthermore, the Council will seek to manage and limit environmental disturbances during construction and demolition as well as during excavations and construction of basements and subterranean developments. To deliver this the Council requires the submission of Construction Management Statements (CMS) for the following types of developments... if substantial demolition/excavation works are proposed.

Policy LP 12 (Green Infrastructure) highlights that to ensure all development proposals protect, and where opportunities arise enhance, green infrastructure, several considerations will be considered when assessing development proposals. These considerations can be viewed in the policy.

Policy LP 13 (Green Belt, Metropolitan Open Land and Local Green Space) states the borough's Green Belt and Metropolitan Open Land will be protected and retained in predominately open use. Inappropriate development will be refused unless 'very special circumstances' can be demonstrated that clearly outweigh the harm to the Green Belt or Metropolitan Open Land.

Policy LP 13 goes further stating appropriate uses within Green Belt or Metropolitan Open Land include public and private open spaces and playing fields, open recreation and sport, biodiversity including rivers and bodies of water and open community uses including allotments and cemeteries. Development will be supported if it is appropriate and helps secure the objectives of improving the Green Belt or Metropolitan Open Land.

Policy LP 15 (Biodiversity) states the Council will protect and enhance the borough's biodiversity but not exclusively, the sites designated for their biodiversity and nature conservation value, including the connectivity between habitats. This will be achieved by protecting and enhancing biodiversity, incorporating and creating new habitats or biodiversity features, ensuring new biodiversity features or habitats connect to the wider ecological and green infrastructure networks and complement surrounding habitats, enhancing wildlife corridors, and maximising the provision of soft landscaping, including trees, shrubs and other vegetation that support the borough-wide Biodiversity Action Plan.

Policy LP 16 (Trees, Woodlands, and Landscape) states the Council will require the protection of existing trees and the provision of new trees, shrubs and other vegetation of landscape significance that complement existing, or create new, high quality green areas, which deliver amenity and biodiversity benefits.

Policy LP 17 (Green roofs and walls) states the use of green / brown roofs and green walls is encouraged and supported in smaller developments, renovations, conversions and extensions.

Policy LP 18 (River Corridors) states development adjacent to the river corridors will be expected to contribute to improvements and enhancements to the river environment. Additionally, development proposals within the Thames Policy Area should respect and take account of the special character of the reach as set out in the Thames Landscape Strategy and Thames Strategy as well as the Council's

Conservation Area Statements, and where available Conservation Area Studies, and/or Management Plans. Developments alongside and adjacent to the River Thames should ensure that they establish a relationship with the river, maximise the benefits of its setting in terms of views and vistas, and incorporate uses that enable local communities and the public to enjoy the riverside, especially at ground level in buildings fronting the river.

Policy LP 18 goes further stating the Council will resist the loss of existing river-dependent and river-related uses that contribute to the special character of the River Thames, including river-related industry (B2) and locally important wharves, boat building sheds and boatyards and other riverside facilities such as slipways, docks, jetties, piers and stairs.

Policy LP 19 (Moorings and Floating Structures) states a mooring or other floating structure will be supported if it complies with the following criteria: it does not harm the character, openness and views of the river, by virtue of its design and height; the proposed use is river-dependent or river-related; there is no interference with the recreational use of the river, riverside and navigation; and the proposal is of wider benefit to the community.

Policy LP 20 (Climate Change Adaption) states the Council will promote and encourage development to be fully resilient to the future impacts of climate change to minimise vulnerability of people and property. Development proposal will be encouraged to minimise energy consumption in accordance with the listed cooling hierarchy.

Policy LP 21 (Flood Risk and Sustainable Drainage) states all developments should avoid, or minimise, contributing to all sources of flooding, including fluvial, tidal, surface water, groundwater, and flooding from sewers, taking account of climate change and without increasing flood risk elsewhere.

Policy LP 21 goes further stating the Council will require the use of Sustainable Drainage Systems (SuDS) in all development proposals. Applicants will also be required to demonstrate that their proposal complies with listed flood defence requirements.

Policy LP 22 (Sustainable Design and Construction) states new non-residential buildings over 100sqm will be required to meet BREEAM 'Excellent' standard. Additionally, in terms of reducing carbon dioxide emissions, all non-residential buildings over 100sqm should achieve a 35% reduction. All new development will be required to connect to existing DE networks where feasible. Any non-residential developments over 1000sqm will need to provide on-site DE and CHP. This also applies where a DE network is planned and expected to be operational within 5 years of the development being completed.

Policy LP 23 (Water Resources and Infrastructure) states the borough's water resources and supplies will be protected by resisting development proposals that would pose an unacceptable threat to the borough's rivers, surface water and groundwater quantity and quality. This includes pollution caused by water run-off from developments into nearby waterways. The Council encourages proposals that seek to increase water availability or protect and improve the quality of rivers or groundwater. Additionally, any new water supply, sewerage or wastewater treatment infrastructure must be in place prior to occupation of the development. Financial contributions may be required for new developments towards the provision of, or improvements to, such infrastructure.

Policy LP 24 (Waste Management) states all developments, including conversions and changes of use are required to provide adequate refuse and recycling storage space and facilities, which allows for ease of collection and which residents and occupiers can easily access, in line with the guidance and advice set out in the Council's SPD on Refuse and Recycling Storage Requirements.

Policy LP 30 (Health and Wellbeing) states the Council promotes and supports healthy and active lifestyles and measures to reduce health inequalities.

Policy LP 40 (Employment and Local Economy) states land in employment use should be retained in employment use.

Policy LP 44 (Sustainable Travel Choices) states the Council will work in partnership to promote safe, sustainable and accessible transport solutions, which minimise the impacts of development including in relation to congestion, air pollution and carbon dioxide emissions, and maximise opportunities including for health benefits and providing access to services, facilities and employment.

Policy LP 45 (Parking Standards and Servicing) states 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. 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 of the Local Plan.

Ham and Petersham Neighbourhood Plan – Adopted (2018-2033)

The purpose of the Neighbourhood Plan is to supplement and build on existing strategic and local policies in the London Plan and the London Borough of Richmond Upon Thames Local Plan which are relevant to key issues in the area of Ham and Petersham. The relevant policies are as follows:

Policy C1 (Protecting Green Character) states the green spaces of Ham and Petersham will be retained and, where appropriate, enhanced to ensure that the boundary is well defined, physically, and visually. Furthermore, the materials and design of structures must be appropriate to the open ‘semi-rural’ character.

Policy C2 (Character and Context Appraisals) states highlights that all applications for new buildings must demonstrate how the proposal addresses the key elements of the neighbourhood character area in which the site is located.

Policy T2 (Motor Vehicle and Cycle Storage) states all non-residential development will include motor vehicle parking and cycle parking spaces in accordance with Local Plan Standards.

Policy CF1 (Community Facilities) states, *‘the extension or relocation of local community facilities will be supported, subject to the services provided being maintained or improved. When there is no longer an identified community need for an existing community use or when it is relocated, primary consideration should be given to using and adapting the vacated premises for other community uses.’*

Policy R2 (Other Businesses and Local Services) states facilities and services which would encourage and sustain small businesses will be supported where they do not conflict with other relevant planning policies.

Policy G1 (Open Spaces) highlights that Ham and Petersham’s green spaces will be conserved and enhanced by their protection from development and its adverse impacts.

Policy G2 (Light Pollution) states any proposals on or adjacent to green spaces which include external artificial lighting, or which are likely to result in significant increases in artificial light levels affecting wildlife corridors, will be required to address the criterion outlined in the neighbourhood plan.

Policy E1 (Sustainable Development) states all new buildings are encouraged to achieve accreditation with the Home Quality Mark or Passivhaus standard.

Policy E3 (Water Efficiency) outlines that development proposals will be encouraged to incorporate water butts into proposals.

Policy E4 (Sustainable Drainage (SuDS)) states all new buildings will be expected to include a sustainable drainage system to dispose of surface water. All sustainable drainage systems must be integrated into the landscape and have a maintenance programme.

Supplementary Planning Documents (SPDs)

In addition to the borough's Local Plan 2018, Richmond have a number of supplementary documents and guidance which are material consideration in the assessment of planning applications. These documents are as follows:

Air Quality SPD (June 2020)

This SPD has been produced by the London Borough of Richmond upon Thames to address common air quality issues affecting the borough and assist in providing a consistent approach to new development. This SPD aims to ensure local environmental impacts of development are not detrimental to the health, safety and the amenity of existing and new users or occupiers of a development or the surrounding area.

Design Quality SPD (February 2006)

This SPD contains three design aspects that need to be considered when proposing development in the borough. These include understanding the process, guiding quality, and borough character. All three aspects aim to ensure the character of the area is respected and enhanced where possible.

Planning Obligations SPD (June 2020)

This supporting document outlines that in addition to the Borough and Mayoral CIL contributions, the Council will seek in line with this SPD that the developer will mitigate any adverse impacts on the environment or local services that arise directly because of the development. For larger developments, applicants are encouraged to discuss such planning obligations at pre-application stage to identify any potential site-specific requirements.

Refuse and Recycling Storage Requirements SPD (April 2015)

This SPD outlines the residual waste and recycling capacity and guidance for developments.

Sustainable Construction Checklist SPD (June 2020)

The supporting SPD outlines that new non-residential over 1,000 sqm will be expected to achieve a BREEAM rating of 'Excellent', Zero Carbon Standards from 2019), submit an Energy Statement and Sustainable Construction Checklist. A BREEAM preliminary Assessment is also required.

Transport SPD (June 2020)

This SPD requires Transport Assessments/Statements to be submitted in accordance with the Transport for London guidance and the Council's Local Plan and submitted alongside the planning application. Furthermore, Travel plans should be developed in accordance with the Local Plan and Transport for London guidance and submitted alongside the planning application.

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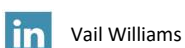
Our services:

- Building Consultancy
- Business Rates Consultancy
- Commercial Property Investment
- Lease Advisory
- LPA Receivership
- Marine and Leisure
- Occupier Advisory
- Property Acquisition and Disposal
- Property Asset Management
- Property Development Consultancy
- Property Planning Consultancy
- Property Valuation

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