



## **PLANNING STATEMENT**

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

Demolition of a seven-storey building; erection of five-storey building plus lift overrun comprising 27 residential dwellings (including 3 wheelchair units) incorporating cycle storage and refuse/recycling store; formation of 6 car parking spaces at grade (including 3 disabled spaces) and 1 delivery bay; landscaping including child play space and ecology enhancement area.

**at Sheldon House, 8 Cromwell Road, Teddington, TW11 9EJ.**

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Chartered Town Planner**

**February 2023**

## 1. INTRODUCTION

### Terms of Reference

- 1.1 This Planning Statement has been prepared by Harper Planning Consultants in support of an application by RHP for full planning permission for the redevelopment of Sheldon House, Teddington to create 27 new affordable homes,

### Background

- 1.2 The application site is located on the north-west end of Cromwell Road at the junction with Fairfax Road and within easy walking distance of Teddington town centre and railway station (mainline services). It is a wedged-shaped site (shown edged in red on the Site Location Plan) with 27 metre frontage to Fairfax Road and 23 metre frontage to Cromwell Road, and comprises 0.165 HA in total. The site backs onto the mainline railway land running between Teddington and Hampton Wick stations which is designated as a Green Corridor. There are a number of mature trees within the site boundary and on neighbouring sites.

Drawing No.	Scale	Title
SH-01	1:500	SITE LOCATION PLAN
SH-02	1:200	SITE LAYOUT AND ROOF PLAN
SH-03	1:200	SITE LAYOUT AND GROUND FLOOR PLAN
SH-04	1:200	CONTEXTUAL ELEVATIONS AND SECTIONS
SH-05	1:200	CONTEXTUAL ELEVATIONS AND SECTIONS
SH-06	1:200	PROPOSED FLOOR PLANS AND ROOF PLAN
SH-07	1:200	BLOCK ELEVATIONS
SH-08	1:25	FAÇADE DETAIL
SH-09	NTS	STREET VIEW RENDERING 01
SH-010	NTS	STREET VIEW RENDERING 02
21100-1	1:200	Topographical Survey
21100-2	1:200	Existing Elevations
2200650-001A	1:250	Foul and Surface Water Drainage Strategy
2200650-002A	1:250	Surface Water Drainage Catchment Plan
MGS45746-U-All-01	1:100	Underground Utilities Survey - general
MGS45746-U-Comms -01	1:100	Underground Utilities Survey - communications
MGS45746-U-Drainage -01	1:100	Underground Utilities Survey - drainage

MGS45746-U-Electric -01	1:100	Underground Utilities Survey - electric
MGS45746-U-Gas -01	1:100	Underground Utilities Survey - gas
MGS45746-U-Ukn&GPR-01	1:100	Underground Utilities Survey-
MGS45746-U-Water-01	1:100	Underground Utilities Survey- water

- 1.3 Sheldon House is a seven-storey, brick-faced block comprising 24 flats with 7 integral garages and 17 car parking spaces at grade. It was constructed in the late 1960s under permission granted to the London Borough of Richmond in 1966 (application reference no. 66/1108).
- 1.4 The building is currently part-occupied by a mix of tenants and leaseholders and falls with the definition of 'previously developed land'.
- 1.5 The development site falls within the freehold ownership of RHP and the access crossover within the ownership of the London Borough of Richmond-upon-Thames. The proposed redevelopment has arisen after RHP commissioned structural surveys of Sheldon House following the identification of structural issues during roof replacement work undertaken in 2017. Copies of the structural reports have been included in the application submission.
- 1.6 This application is supported by the following drawings prepared by Clive Chapman Architects:
- 1.7 The application is also supported by the following technical surveys, reports and appraisals prepared by independent professional consultants in accordance with the requirements of the Local Validation Checklist adopted by Richmond Borough Council (2<sup>nd</sup> December 2019 – revised April 2021):

Document	Prepared by	Date Issued
Planning Statement incorporating Affordable Housing Statement.	Harper Planning Consultants	
Community Infrastructure Levy (CIL) additional information	Harper Planning Consultants	
Design and Access Statement (including Wheelchair Housing Statement, Inclusive Access Statement and Residential Standards Statement)	Clive Chapman Architects	February 2023
R01-DF-Transport Statement	TTP Consulting	January 2023
Air Quality Assessment	Aether	01/09/22
Noise Survey & Acoustic Impact Assessment 22965.NIA.01 Rev A	KP Acoustics	11/01/23
Flood Risk Assessment and Drainage Strategy including SuDS Assessment for the Management of Surface Water Run-off and Foul Water Discharge 2200650-01B	Ardent Consulting Engineers	January 2023
Utilities Desk Top Search	Murphy Geospatial	12/05/22
Energy & Sustainability Report incorporating Sustainable Construction Checklist and Water Efficiency Calculations	Clive Chapman Architects	January 2022
Whole Life Cycle Carbon Emissions Assessment	Hodkinson	16/12/22

Planning Fire Statement	Part B	13/01/23
RIBA 2 Concept Design Report	Part B	13/01/22
Dynamic Overheating Report	Hodkinson	January 2023
Internal Daylight and Sunlight Report (within development)	Rights of Light Consulting	14/12/22
Daylight Sunlight Report (Neighbouring Properties)	Rights of Light Consulting	14/12/22
Rapid Health Impact Assessment	Hodkinson	16/12/22
R02-DF-Construction Management Statement	TTP Consulting	January 2023
Preliminary Ecological Appraisal incorporating Biodiversity Net Gain Assessment	Middlemarch Environmental	09/03/21
Preliminary Bat Roost Assessment	Middlemarch Environmental	09/03/21
Landscape Report & Landscape Plan	Outerspace	15/02/23
SH-11 Urban Green Factor	Clive Chapman Architects	14/02/23
Public Open Space Assessment	Clive Chapman Architects	26/01/23
Arboricultural Survey, Impact Assessment and Method Statement MDJAC-22.143-AIA-01A+apps	MDJ Arboricultural Consultancy	December 2022
Land Contamination & Geotechnical Investigation	AGB Environmental	03/08/22
Historic Environment Desk-Based Assessment	AOC	June 2022
Structural Report – Investigation of Masonry Walls	Sandberg Consulting Engineers	31/01/18
Property Review and Budget Costs	Churchill Hui	05/12/19

## **Content**

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

**Section 1 Introduction**

**Section 2 Site and Surroundings**

**Section 3 Relevant Planning History**

**Section 4 Community Engagement**

**Section 5 Application Submission**

**Section 6 Planning Policy Framework**

**Section 7 Key Planning Considerations**

**Section 8 Conclusions**

## **List of Appendices**

**Appendix One LPA Pre-application Response**

**Appendix Two Design Review Panel Response**

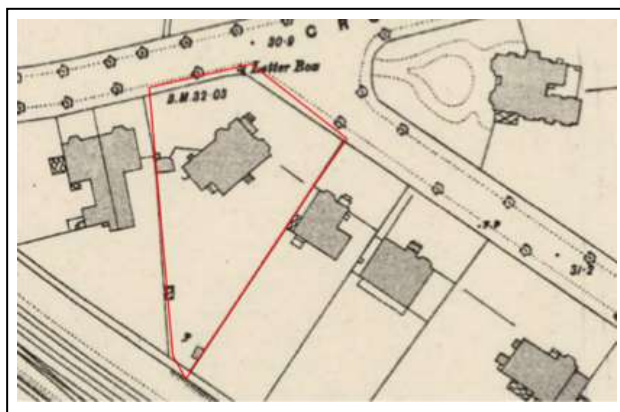
**Appendix Three Public Consultation Leaflet**

**Appendix Four Officer's report on 2 Cromwell Road**

**Appendix Five Appeal decision on 2 Cromwell Road**

## 2. SITE AND SURROUNDINGS

- 2.1 The application site is located to the south of Teddington town centre at the junction of Fairfax Road and Cromwell Road and within the London borough of Richmond-upon-Thames.
- 2.2 It is a wedged-shaped site with a 28 metre frontage to Fairfax Road and 23 metre frontage to Cromwell Road. The maximum depth of the site is approximately 66 metres tapering towards the rear boundary which abuts onto railway land. The Topographical Survey (21100-1) confirms the natural ground level is relatively flat across the site (approximately 9.1 metres AOD). The site area comprises 0.165 Ha in total.
- 2.3 Sheldon House is a seven-storey, red brick-clad building with symmetrical façade and prominent central stair core fronting obliquely onto Fairfax Road. There are 4 garage doors in the ground floor frontage and 3 additional garages incorporated in a single-storey side extension. The building comprises 24 self-contained flats – 12 studio flats and 12 one-bedroom flats.
- 2.5 An Ordnance Survey map (1936) appended to the Historic Environment Desk-based Assessment illustrates the historic development of the site and its surroundings. Drawing no. 01/26301/DBA/06/01 shows that the site was initially developed in the late 19<sup>th</sup> century with a substantial double-fronted detached villa incorporating projecting canted bays facing obliquely onto Cromwell Road and Fairfax Road. The villa was demolished and replaced by Sheldon House in the late 1960s.



- 2.6 An existing cross-over off Cromwell Road provides vehicular access to the site with 7 garages and 17 forecourt parking spaces on the road frontages. The relevance of the vehicular access arrangements and proposed car parking provision in relation to highway safety is also considered in the Transport Statement.
- 2.7 The site includes a large number of mature trees including significant trees on the Fairfax Road frontage and in close proximity to the side elevation of Sheldon House. A comprehensive Tree Survey is incorporated in the Arboricultural Impact Assessment submitted with the application (Tree Survey Schedule at Appendix 1). Tree are shown on the Tree Protection Plan (Appendix 2) which identifies all trees to be retained/removed as part of the development as well as Root Protection Areas and areas of sensitive excavation.

- 2.8 A detailed description of the site and its context is set out in the Design and Access Statement (pages 3-6) with photographs of the existing site appearance — it also identifies the most relevant development constraints and opportunities.

#### **Development Plan Designation**

- 2.9 The site falls within the London Borough of Richmond-upon-Thames and the relevant Development Plan policy context is set in the London Plan (March 2021) and the Richmond-upon-Thames Local Plan (2018) as well as the Local Plan Policies Map (updated July 2020). There are no site specific designations covering the application site and it is not identified as an Allocated Site in the Development Plan. The site is not situated within a conservation area or other designated area of environmental significance. The adjacent building (nos. 4-6 Cromwell Road) is registered as Buildings of Townscape Merit (locally listed building) by the London Borough of Richmond-upon-Thames. The Historic Environment Desk-Based Assessment confirms the proposed development would not be visible from any statutory designated heritage assets and would not affect their settings.

The site falls within an 'Area Poorly Provided with Public Open Space' as defined on the Local Plan Policies Map (updated July 2020) on the basis that it is situated more than 400metres from an area of public open space. However, the Public Open Space Assessment submitted with the application shows the proximity of a range of play spaces, playing fields and other recreational facilities which lie between 400- 1200 metres from the site.

- 2.10 The site lies to the south of Teddington Controlled Parking Zone (CPZ – T) and within a borough-wide 20mph speed limit which applies to all roads surrounding the site.

#### **Borough Character Study**

- 2.11 The application site lies within a predominantly residential area to the south-east of Teddington town centre. The prevailing form of development in the locality comprising a mixture of detached and semi-detached and terraced houses (some converted into flats) as well as purposed-built blocks of flats.
- 2.12 In accordance with the recommendations of the National Planning Policy Framework (NPPF), Richmond Council has undertaken townscape characterisation studies of the borough to identify the different local townscape characteristics of their area. The Council has also published Village Planning Guidance to accompany each character study.
- 2.13 The application site lies within Hampton Wick ward situated in the south of the borough. It falls within the boundary of the Hampton Wick and Teddington Village Plan and within 'Character Area 13: Sandy Lane and Surrounds'.

#### **Public Transport Accessibility**

- 2.14 The Transport Statement submitted with the application confirms the site has a PTAL 2 score. Notwithstanding a relatively low PTAL rating, the Transport Statement demonstrates the site is highly accessible by a range of sustainable transport methods including walking, cycling and public transport. In particular, the site is located within easy walking distance to Teddington town centre and railway station as well as schools, library and public open space, notably Bushy Park, as well as a wide range of other local services including Teddington Memorial Hospital.

### 3. RELEVANT PLANNING HISTORY

3.1 The planning history of a development site is relevant to consideration of an application for planning permission because it may establish the lawful or authorised use of buildings or land, and in the case of an extant permission, confirm the acceptability of certain issues in respect of alternative development proposals for the site.

3.2 Planning case law has confirmed that the planning history of the site may also be significant in the context of consistency in decision-making. Although each application must be assessed 'on its own merits' having regard to all material considerations, similar issues need to be decided by local planning authorities in a consistent manner.

3.3 On the basis of a review of online information available on Richmond-upon-Thames Planning Register, the previous decision granting planning permission for the construction of Sheldon House in 1966 as well as permission for redevelopment of no. 2 Cromwell Road and extensions to no.6 Cromwell Road are considered to be relevant to an assessment of this scheme. These planning decision are considered below.

#### **Redevelopment of 8 Cromwell Road (66/1108)**

3.4 An application for planning permission (Council's Own Development) was approved by the London Borough of Richmond-upon-Thames on 11th August 1966 for the erection of a 7-storey block of 24 flats, 7 garages and provision of 17 parking spaces. Permission was granted without any condition or legal agreement restricting the residential tenure of the development.

#### **Redevelopment of 2 Cromwell Road and land adjoining (05/2675/FUL)**

3.9 Permission was granted on appeal for the demolition of an existing bungalow and detached garages, clearance of the site and construction of 5 x 1 bedroom, 3 x 2 bedroom and 1 x 3 bedroom flats, including site hard and soft landscaping. The application was recommended for approval and refused permission by Richmond-upon-Thames Planning Committee due to the effects of the proposal on:

- a) The character and appearance of the area, and
- b) The living conditions of the occupants of neighbouring residential properties in terms of visual impact, privacy, daylight and sunlight.

3.10 With reference to the character and appearance of the area which includes 4-6 Cromwell Road and Sheldon House, paragraph 8 of the Appeal Inspector's decision notes:

*"Overall, therefore, the character of the residential area in the vicinity of the appeal site is very varied. It appears to me that what is required is not a building which copies the style of one or more existing building, but is a distinctive modern building which respects its general context and sits well with neighbouring buildings."*

3.11 In relation to the form and scale of development (paragraph 9), the Inspector states:

*"In agree with the appellant that the asymmetry of the proposed building would not detract from the symmetrical appearance of these buildings [4-6 Cromwell Road]. It would be of lesser scale and mass than Sheldon House, Redlands or Grosvenor Court, but I find that to be to its credit."*

3.12 In recommending the application for approval the Officer's Report to the Planning Committee notes:



*“The new design is considered to respond appropriately to its context and to provide a coherent solution, although the materials and landscaping will be important elements. The height and siting take into account the adjoining building, whilst the design is site specific. There will be a gap of 7m between the existing [4 Cromwell Road] and proposed buildings. I am satisfied that the proposal represents a good standard of design in isolation and, bearing in mind the distance between the proposed building and the adjoining Building of Townscape Merit its setting will be maintained.”*

- 3.13 In Paragraph 9 of the appeal decision letter, the Inspector concurs with the officer’s assessment of the benefits of a 7m gap between the existing and proposed buildings. It should be noted that the gap between 6 Cromwell Road and the proposed development will be 7.2m, as annotated on the Site Layout and Ground Floor Plan.

**6 Cromwell Road (DC/CJB/08/0057/HOT)**

- 3.14 Permission was granted on 14<sup>th</sup> May 2008 for replacement of a garage with first floor extension over, new extensions to the rear and replacement of existing conservatory, single-storey extension and alterations to front boundary. The original submission was amended following negotiations with the case officer to ensure the ground and first floor side extension were set back from the main façade in accordance with the adopted SPD.

- 3.15 The officer’s report confirms:

*“The 1<sup>st</sup> floor extension would be much smaller than previously proposed and would be set back 7.75m behind the front wall of the main house. It would be 6.5m high, 2.6m wide set in 0.4m from the side boundary and 4.5m long projecting 2.8m beyond the rear wall of the main house and cranked to follow the line of the site boundary. “*

**Summary**

Previous planning decisions in respect of no.2 and no.6 Cromwell Road have noted the varied townscape character of the locality and the acceptability of an asymmetrical contemporary design approach that respects the overall townscape character. In terms of respecting the setting of the neighbouring BTM, a townscape gap of 7 metres was considered appropriate. The proposed development has been designed consistent with these development principles.

## **4. COMMUNITY ENGAGEMENT**

### **Resident Consultation**

- 4.1 RHP commissioned structural surveys of Sheldon House after structural issues were identified during roof replacement work in 2017. Copies of the structural reports have been included in the application submission.
- 4.2 At that time tenants and leaseholders were made aware of the structural issues through a 'notification of works'. Homeowners also received an NOI Section 20 notice in March 2019 letting them know that RHP intended to carry out structural repairs to the core of the building. The repairs were not completed due to the prohibitive costs identified in the tender exercise.
- 4.3 In December 2020, RHP notified all tenants and leaseholders of Sheldon House that, due the extent of the core structural repairs needed and the extent of major works envisaged over the coming years, different options were being considered including a full redevelopment.
- 4.4 Following an initial consultation in December 2020, in March 2021 residents were updated on three proposed options for the building and provided with a six-week consultation period for feedback via (a) dedicated email address and (b) a dedicated contact person to speak to directly, as well as virtual Zoom consultation meetings. This consultation ended on the 15<sup>th</sup> of April 2021.
- 4.5 RHP received feedback from 5 of the 7 homeowners in Sheldon House. From those who responded, there was a unanimous agreement that option three (redevelopment) was preferred. In particular, homeowners raised specific concern over any further increase to their service charge if another option were chosen over redevelopment.
- 4.6 RHP also received feedback from 10 of the 13 tenanted households at Sheldon House. From these responses there was mixed feedback, reflecting each tenant's personal circumstances. Some tenants responded positively to the possibility of potential rehousing to family-sized accommodation that would better meet their current housing need, due to an increase in their family size since their first nomination. Others were concerned about potentially being moved further away from the local area. RHP has confirmed that they will seek to rehouse tenants in preferred locations where possible, or return to the redeveloped Sheldon House. These occupiers also advised, however, that they would be open to being rehoused should their specific housing needs be met. Two tenants were against redevelopment and would prefer option one so they do not have to be rehoused, or option two so they could return to their existing flat at Sheldon House.
- 4.7 Following the feedback RHP received from all residents, an internal approval was agreed for the redevelopment of the site. This was communicated to all residents of Sheldon House on 14 May 2021 and included the details of the decision notice, customer offer and next steps. Over a period of 18 months, RHP was in regular contact and working with their residents on any housing matters they had and any updates or appointments on or around the scheme.
- 4.8 RHP wrote and engaged with their residents to attend a Consultation event held on 30<sup>th</sup> November 2022. This was held ahead of the public consultation and allowed the residents to review the proposals and ask any questions that they had about the scheme.

### **Pre-application Submission to Richmond Council**

- 4.9 Having regard to national planning guidance which seeks to ensure greater efficiency and certainty in the planning process, the applicant submitted sketch proposals to the Local Planning Authority (LPA) for pre-application advice in accordance with Richmond-upon-Thames pre-application procedures.

- 4.10 The pre-application submission scheme for a six-storey block of 34 affordable dwellings is illustrated in the DAS and the LPA's pre-application response is appended this Planning Statement. The pre-application response summarises the relevant policy context and identify site-specific planning constraints. The responses also include recommendations for amendments to the scheme and additional information required to ensure the application submission is fully policy compliant.
- 4.11 The LPA's response identifies key land use planning considerations applicable to redevelopment of the site having regard to relevant Development Plan policies as follows:
- Principle/Land Use;
  - Design;
  - Trees;
  - Biodiversity;
  - Transport;
  - Sustainability;
  - Green Roof.
- 4.12 The response confirms that the principle of the proposals is considered to be acceptable and identifies a number of detailed requirements to meet in a full planning application. The application submission addresses fully all points raised in the pre-application response, as summarised below.

#### *Land Use*

- 4.13 Residential design standards are required to be met and an equivalent quantum of social rent floor space re-provided on site. The existing building is unencumbered by restrictions on tenure. The proposed development provides new affordable housing including social rent floor space in excess of the quantum sought by the Development Plan.

#### *Response*

- 4.14 The Schedule of Accommodation confirms that the equivalent social rent floorspace has been re-provided in the new development. The annotated floor plans and DAS demonstrate that residential design standards have been met. The scheme includes a detailed landscape plan to ensure adequate standards of privacy and outlook, particularly in terms of the relationship between the two blocks. The application is supported by the technical documents demonstrating the scheme's compliance with all relevant residential quality standards and residential amenity as follows:
- Residential Standards Statement (see DAS);
  - Inclusive Access Statement (see DAS);
  - Desktop Health Impact Assessment;
  - BS 8233 Environmental Noise Assessment;
  - Air Quality Report;
  - Internal Daylight Report.

#### *Design*

- 4.15 The pre-application advice considers the 6-storey massing of the building to be handled quite well apart from its overall footprint and proximity to the adjoining BTMs requiring a wider gap and similar scale to the gap found on the other side of the BTMs (4-6 Cromwell Road & 2 Cromwell Road). The application submission should include street elevations as well as views and visuals from various directions. A green roof will be required and any roof plant/pv panels proposed should be shown on submitted roof plans and elevations.

*Response*

- 4.16 The revised scheme addresses fully these comments by re-positioning the flank elevation and increasing the townscape gap with 6 Cromwell Road to 7.2 metres, and reducing the overall building height to 5-storeys. The application submission is accompanied by street elevations and visual montages of the proposed development in relation to the neighbouring BTM.

*Trees*

- 4.17 The LPA's response notes root protection areas within the tree submission have not been modified according to BS 5837:2012 and would need to be modified to take account of adjacent influences on rooting morphology (including roads, building foundations, basements etc). Concern was raised about modification of hardstanding around T3, loss of T13 and the proximity of T9 to the southern corner of the proposed building. The widening of the entrance from Cromwell Road into the site was also queried by tree officers

*Response*

- 4.18 The scheme has been amended to remove car parking at the rear of the site and reduce a hardstanding around T3 and at the rear of the proposed building. In addition, sensitive excavation is proposed within the root protection area of T9 and further justification is provided in the Arboricultural Impact Assessment to substantiate the decision to fell T13. Whilst it is a large example of its species, T13 is in poor structural condition having been colonised by the decay fungus Dyer's Mazegill (*Phaeolus schweinitzii*) and this will likely significantly reduce its safe useful life expectancy. The overall arboricultural magnitude of the proposed scheme is defined as low.

*Biodiversity*

- 4.19 The pre-application response advises against an overall loss of soft landscaping. Details of external lighting, landscaping, ecological enhancements and green roof would also be required, along with bat emergent surveys.

*Response*

- 4.20 The application is supported by relevant reports as requested.

*Transport*

- 4.21 The pre-application response requests a complete a vehicular parking stress survey on all streets within 200m walking distance of the site to facilitate an assessment of the impact of any overspill parking arising from the development on existing on-street car parking capacity and the likelihood of unsafe on-street parking occurring. A Demolition and Construction Management Plan is also required.

*Response*

- 4.22 The application submission includes a Parking Survey appended to the Transport Statement which suggests the parking occupancy levels for streets surrounding the site will fall below the 85% threshold, which the Council consider 'stress' to occur and hence the proposed development does not lead to a severe impact on parking conditions on local streets. A Construction Management Plan has been prepared to accompany the application to mitigate the effects of construction works associated with the development.

*Sustainability*

- 4.23 The Council's Sustainable Construction Checklist and an Energy Statement are required to demonstrate that the scheme will achieve 35% CO2 emissions complying with a Building Regulations 2013 compliant scheme with 20% of energy generated via renewables. In addition, a surface water drainage strategy should be submitted which demonstrates that sustainable urban drainage principles and a water usage calculator demonstrate a water efficiency target of 110 litres per person per day.

*Response*

- 4.24 The application submission includes these documents as requested, confirming compliance will all sustainability targets.

*Green Roofs*

- 4.25 Details are required to demonstrate 70% roof coverage by a green or brown roof, 70% soil / vegetation coverage, a minimum substrate depth of 85mm, maximum of 30% hard surface and details of the proposed specification and maintenance.

*Response*

- 4.26 The scheme incorporates 361 square metres green roof surface and the DAS includes a section for the green roof construction build-up including 85mm+ biodiverse substrate.

*Fire Safety*

- 4.27 All major applications should be submitted with a Fire Safety Statement, should also include a Fire Safety Strategy and an evacuation lift incorporated within the scheme.

*Response*

- 4.28 The application is supported by a Fire Safety Statement and an evacuation lift incorporated within the scheme.

*Summary*

- 4.29 The pre-application response from the Local Planning Authority identifies the need to provide additional information to ensure the compliance with the relevant Development plan Policies and associated guidance. These reports are provided in support of the application.
- 4.30 The applicant has engaged in proactive dialogue with the LPA at an early stage of the design process and has responded positively to the LPA's comments to ensure the submission scheme is policy compliant and the application (including supporting documents) addresses fully all matters raised during the pre-application process.

**Richmond Design Review Panel**

- 4.31 The draft scheme was presented to Richmond Design Review Panel (DRP) on 19<sup>th</sup> July 2021. The DRP consisted of the following panel members:

Craig Sheach, Partner, PRP (Chair)  
Brendan Tracey, Director, Phillips Tracey Architects  
Beatrix Young, Director, Weston Williamson + Partners  
Amanda Whittington, Partner, Feilden Clegg Bradley Studios

- 4.32 The DRP was also attended by members of LB Richmond Planning Team as well as Ward Councillors. A summary of advice issued by the DRP and the scheme architect's design responses are set out in the DAS.

**Public Consultation**

- 4.33 Prior to a planning submission, the applicant invited neighbouring residents as well as the wider community of Teddington to a public consultation event held at RHP's offices at: 8 Waldegrave Road, Teddington, TW11 8GT on 30th November 2022 between 6-7:30PM. Letters were sent to neighbouring residential properties surrounding the site and consultation leaflets were also displayed outside the site, at Teddington railway station and Teddington library.

4.34 The event was attended by representatives of RHP as well as the scheme architects, Clive Chapman Architects who were available to answer questions and discuss consultees' responses and feedback on the proposals. The consultation invitation letter, publicity leaflet and feedback form are appended to this statement. All consultation responses were reviewed by the design team and collated into a summary table set out below.

No.	Question	Y	N	N/A	Comment Made	Gardening	Growing Food	Picnicking	Quiet Space to sit
1	Are you a resident of Teddington?	10							
A	If Yes, are you a resident of Sheldon House?	2	8						
B	If yes, are you a Tenant or a Leaseholder?	2	8						
C	If No, are you a Private Tenant?		10						
D	If no, where are you resident?				6				
Section 1	RHP tenants and leaseholders currently and previously living at Sheldon House only								
2	How would you see yourself using the outside communal space?			7		1			2
3	How do you feel about the internal private space?			8					
4	Do you support the provision of new affordable homes to meet local need?	10							
5	Do you support the proposal scheme to be lower than the existing building?	10							
6	Do you consider the scheme should reflect the prevailing building design of Fairfax and Cromwell Road?	9		1					
7	Do you support the proposal to protect existing trees and provide new trees and landscaping?	7	3						
8	Do you agree that the scheme should provide sustainable energy efficient homes?	10							
9	Do you have any further feedback or comments?			2	8				

4.35 The main points of feedback within the comments were as follows:

- Parking impacting on surrounding areas as the scheme doesn't allow enough;
- Balconies and use not to impact on neighbours in terms of noise and overlooking;
- Construction impacting on the surrounding areas in terms of noise, dust and length of construction period;
- Retention of trees and gardens for residents and wildlife;
- Communication to the wider neighbourhood;
- Support for design and improvement to the site;
- Unnecessary demolition of the building to gain three additional units.

## 5. APPLICATION SUBMISSION

- 5.1 The application seeks full planning permission for the demolition of a seven-storey residential building and the erection of a five-storey residential building comprising 27 dwellings (16 x one bedroom, 8 x two bedroom and 3 x three bedroom units), and incorporating secure cycle and refuse storage structures; alterations to an existing vehicular access and creation of a new pedestrian access, formation of 7 car parking spaces at grade including one delivery space; landscaping including communal amenity space and ecological enhancement area.

### Tenure and Mix

- 5.2 The applicant is a Registered Provider and the new residential building will provide 100% affordable dwellings comprising a mix of affordable tenures and unit sizes as set out below:

Unit	Size (m2)	Floor	Tenure
1B/1P	39	4	Shared Ownership
1B/1P	39	4	Shared Ownership
1B/2P	50	1	Social Rent
1B/2P	50	1	Social Rent
1B/2P	50	1	Social Rent
1B/2P	50	2	Social Rent
1B/2P	50	2	Social Rent
1B/2P	50	2	Social Rent
1B/2P	50	3	London Living Rent
1B/2P	50	3	London Living Rent
1B/2P	50	3	London Living Rent
1B/2P	50	4	Shared Ownership
1B/2P	50	4	Shared Ownership
1B/2P	50	4	Shared Ownership
2B/3P	61	1	Social Rent
2B/3P	61	2	Social Rent
2B/3P	61	3	London Living Rent
2B/3P	61	4	Shared Ownership
2B/4P	70	1	Social Rent
2B/4P	70	2	Social Rent
2B/4P	70	3	London Living Rent
3B/5P	86	1	Social Rent
3B/5P	86	2	Social Rent
2B/5P	86	3	London Living Rent

1B/2P M4(3)	60	G	Social Rent
1B/2P M4(3)	60	G	Social Rent
2B/4P M4(3)	81	G	Social Rent

5.3 The proposed tenure split comprises:

Social Rent	15 units	(56%)
London Living Rent (Intermediate)	6 units	(22%)
Shared Ownership (Intermediate)	6 units	(22%)

5.4 The proposed development incorporates a mixture of unit sizes appropriate to the site-specifics of the locality and proximity to Teddington town centre and railway station, as follows:

- 1 bedroom 16 units (59.3%)
- 2 bedroom 9 units (33.3%)
- 3 bedroom 2 units (7.4%)

#### Housing Quality

5.5 The annotated floor plans and DAS confirm that all new dwellings have been designed to meet or exceed the National Technical Housing Standards in terms of unit sizes (Gross Internal Area), room sizes and storage provision.

5.6 As confirmed by the Internal Daylight and Sunlight Report, all units exceed the BRE criterion of at least one room seeing 1.5 hours of direct sunlight on the spring equinox. All habitable rooms but one within the residential dwellings will also exceed the minimum recommendation for sunlight availability. A single first-floor bedroom located in the mews block falls marginally short of the minimum recommended provision.

#### Inclusive Access

5.7 The Wheelchair Housing Statement and Inclusive Access Statement incorporated within the Design and Access Statement (pages 28 & 48) confirms that 3 x M4(3) Wheelchair user dwellings: (b) Wheelchair accessible dwellings, located on ground floor. This equates to 11% of the total units. All remaining units to M4(2) Accessible and adaptable dwellings. 3 x Disabled parking spaces have been provided for the wheelchair units, accessed directly from a communal corridor to the undercroft parking court.

#### Architectural Design

5.8 The design rationale section of the DAS demonstrates how the applicant has adopted a design-led approach to redevelopment of the site to ensure that the layout, scale and massing of the proposal respond to the site's unique townscape context. The scheme has been designed to optimise the development potential of the site and build on the positive characteristics of the surrounding area ensuring no adverse impact on neighbouring amenity or the character and appearance of the locality. The proposed architectural style and materials are described in detail in the Design and Access Statement.

#### Access and Parking Provision

5.9 The scheme proposes the amendment to an existing vehicular access to the site off Cromwell Road and the creation of a separate pedestrian access off Fairfax Road to improve pedestrian safety into the site and on the public highway.



- 5.10 The development will be 'car-lite', i.e. there will be limited of on-site car parking for residents comprising 3 disabled parking spaces and 3 spaces allocated to 3-bedroom units as well as an occasional delivery bay for drop-off and pick-up of bulky goods. The scheme also incorporates 49 conveniently located, secure cycle parking within the residential block and additional 4 occasional use spaces (Sheffield Stands) incorporated within the frontage landscaping plan. The proposed provision accords with the Council's adopted standards.

#### Landscaping

- 5.11 The proposed landscape design and maintenance plan set out in the Landscape Report and Landscape General Arrangement Plan prepared by Outerspace Landscape Architects is integral to the overall design of the development. The landscaping proposals complement the form, scale, siting and orientation of the proposed buildings and provide an attractive mix of soft and formal spaces that will encourage both biodiversity and human/nature interaction.
- 5.12 The Landscape Report (Page 15) confirms the scheme has an **Urban Greening Factor of 0.68** comprising 1120.4 square metres in total which exceeds the Residential Target Factor of 0.4.

#### Amenity Space Provision

- 5.13 The scheme seeks to maximise the provision of private amenity space, having regard to the nature of the development in this location and the site's location within walking distance of a range of public open space amenities. The annotated floor plans confirm that all new dwellings have access to private external amenity space in the form of patio terraces or balconies which comply with the relevant minimum space standards, and additionally have access onto inclusive communal amenity space as well as an incidental playspace and wilded area at the rear of the site. The Landscape Design Concept and Masterplan (Landscape Report pages 4 and 5) illustrate the accessibility to communal amenity space.
- 5.14 The Play Space and Child Occupancy Assessment included with the Open Space Assessment includes a Playspace Strategy and Child Yield Occupancy Assessment. The yield calculator estimates 17.1 total children that will occupy this development. As this figure is higher than 10, a dedicated on-site play space is provided as an integral part of the landscape plan, with a minimum amenity area of 170.9m<sup>2</sup>. The play space consists of 3 areas of different character and possibilities of varied form of play:

- Formal play - 47.5 m<sup>2</sup>
- Lawn - 77.8 m<sup>2</sup>
- Informal play - 61.3 m<sup>2</sup>

#### Ecology

- 5.15 The scheme will include a range of ecology mitigation and biodiversity enhancement measures proposed by the Preliminary Ecological Appraisal and incorporated in the landscape design and planting strategy, including a wildlife area and installation of hedgehog pass, bat boxes, nest boxes and deadwood habitat.

#### Waste Management

- 5.16 Details of the proposed refuse/recycling provision and servicing facilities are illustrated in the Design and Access Statement. The refuse/recycling provision and carry distance comply with the LBRuT Refuse & Recycling Storage Requirements SPD.

#### Energy and Sustainability

- 5.17 The Energy and Sustainability Statement confirms key sustainability features within the development in compliance with the borough's sustainable construction and design standards for major residential development which include:

- The proposal can achieve the required reduction of carbon dioxide emissions, with a demonstrated 45.05% reduction over Building Regulations Part L1A, bettering the reduction target of 35%;
- Provides a portion of 35.88% reduction in CO2 emissions and CO2 sequestration through the provision of energy efficiency measures with ground source heat pumps, bettering the target of 10%
- Internal water use will meet the requirements of the London Borough of Richmond-upon-Thames Local Plan for an internal water use of 110litres/person/day (see Appendix E);
- The inclusion of sustainable transport options in accordance with Healthy Streets approach by prioritizing walking and cycling and minimizing trips by motorized vehicles;
- A sustainable materials procurement policy and an efficient waste strategy on site;
- The implementation of health and wellbeing measures; and
- Biodiversity enhancement measures.

5.18 In addition, the CO2 emissions of the scheme have been calculated using the SAP 10.0 carbon emission factors and the scheme can achieve:

- An on-site CO2 reduction beyond Building Regulations through energy efficiency measures and maximised of renewable technologies (Ground Source Heat Pumps)
- The development achieves CO2 improvement through energy efficiency measures, 'Be Lean 'stage.
- A further improvement of CO2 has been achieved through renewable technologies 'Be Green 'stage (Ground Source Heat Pumps).

#### **Sustainability Urban Drainage**

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

5.20 A number of SuDS components proposed as part of a surface water drainage strategy have been for the site, specifically attenuating surface water in an area of tanked permeable paving throughout the site. The proposed SUDs design is supported by a Management and Maintenance Plan submitted with the application.

## 6. PLANNING POLICY CONTEXT

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

### **National Planning Policy Framework**

- 6.2 The National Planning Policy Framework (NPPF) sets out the Government's current national planning policy for England. The key national policy, as set out in the NPPF, states that a presumption in favour of sustainable development lies at the heart of the Framework. The 'presumption' does not change the statutory status of the Development Plan as the starting point for decision-making and local planning authorities may take decisions that depart from an up-to-date development plan by application of the 'planning balance' if material considerations in a particular case indicate the plan should not be followed.

### *Housing Provision*

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

### *Small and Medium Sized Sites*

- 6.4 The NPPF highlights the important contribution that small and medium sites – such as the application site – can make to meeting local housing need. The Framework recognises that small sites are often built out relatively quickly, thereby making a significant contribution towards meeting housing delivery targets in the short-term. National planning policy also requires local planning authorities to support the development of 'windfall sites' such as the application site, through their policies and decisions – giving '**great weight**' to the benefits of using suitable sites within existing settlements for homes. Hence, the NPPF requires great weight to be given to the benefits of redeveloping the application site for new housing to meet an identified local need.

### *Achieving Appropriate Densities*

- 6.5 The NPPF promotes the effective use of land to meet the need for homes by achieving appropriate densities. Paragraph 122 encourages LPAs to support development that makes efficient use of land taking into account the desirability of maintaining an area's prevailing character and setting or of promoting regeneration and change.

- 6.6 The NPPF also encourages the use of minimum density standards to seek a significant uplift in the average density of residential density within cities, town centres and other locations that are well served by public transport. Density ranges should also be set in other areas that reflect the accessibility and potential of different areas – rather than one broad density range.

### *Achieving Well-Designed Places*

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

- 6.8 The NPPF requires design policies that seek to protect local character to be grounded in an understanding and evaluation of each area's defining characteristics to provide maximum clarity about design expectations. The Framework encourages the publication of character studies that identify the special qualities of each area and explain how these qualities should be reflected in development. The Design and Access Statement confirms that the proposed development will not affect the townscape character of the locality as identified in the Hampton Wick and Teddington Planning Guidance.

*Highway Safety*

- 6.9 NPPF 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. The Transport Statement confirms that the proposed 'car-lite' development would not have an unacceptable impact on highway safety or the road network.

**THE DEVELOPMENT PLAN**

- 6.10 For the purpose of assessing the application against relevant policies, the 'Development Plan' relevant to consideration of development of the site comprises the London Plan (March 2021) – the Strategic Development Strategy – and the London Borough of Richmond-upon-Thames Local Plan adopted on 3<sup>rd</sup> July 2018.

- 6.11 Under section 38(5) of the Planning and Compulsory Purchase Act 2004 if a policy contained in a Development Plan for an area conflicts with another policy in the Development Plan, the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approved or published. In this case, the London Plan was adopted most recently and any policy conflict with the Local Plan must be resolved in its favour.

- 6.12 The London Borough of Richmond -upon-Thames has commenced preparation of a new Local Plan for the borough which, in due course, will replace the current Local Plan. Consultation of the Pre-Publication Draft Local Plan was undertaken between December 2021 and January 2022. The Council is currently preparing a revised Draft Local Plan for submission and examination.

- 6.13 The Draft Local Plan has not yet an advanced stage and little weight should be attached to the draft policies. However, the significant changes to the Evidence Base since adoption of the Local Plan in 2018 may be relevant. The draft Local Plan policies also indicate the 'direction of travel' for the Development Plan which may be a material consideration in an assessment of proposed development.

**The London Plan 2021**

- 6.14 The London Plan 2021 (also known as a Replacement Plan) is the new London Plan – it is not an alteration or update to previous London Plans. All previous iterations of the London Plan from 2004-2016 were alterations and have now been replaced by the London Plan 2021. It should be noted that the pre-application scheme was assessed by the LPA against the current London Plan which provides substantial support for the proposed development.

- 6.15 **Policy D1 London's form, character and capacity for growth** requires boroughs to undertake area assessments to define the characteristics, qualities and value of different places within the plan area to develop an understanding of different areas' capacity for growth. The adopted Local Plan allocates a target of 650-700 new dwellings for Teddington and the Hamptons between 2015 and 2035. Hampton Wick and Teddington Village Planning Guidance confirms that new housing to meet local needs will be provided on appropriate sites.

- 6.16 **Policy D2 Infrastructure requirements for sustainable densities** requires boroughs to also undertake area assessments to define the characteristics, qualities and value of different places within the plan area to develop an understanding of different areas' capacity for growth. Where there is currently insufficient capacity of existing infrastructure to support proposed densities (including the impact of cumulative development), boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time. The submission documents confirm there is sufficient capacity of existing infrastructure to support the proposed development and uplift of future occupiers on the site.
- 6.17 **Policy D3** seeks to optimise development site capacity through a 'design-led approach'. This policy replaces the previous approach to site optimisation which was based on a density matrix. The design-led approach requires all development to make the best use of land by ensuring that development is of the most appropriate form and land use for the site. 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.
- 6.18 **Policy D4 Delivering good design** requires Design and Access Statements submitted with development proposals to demonstrate that the scheme meets the design requirements of the London Plan and encourages design scrutiny by borough planning, urban design and conservation officers as well as expert advice where appropriate.
- 6.19 The DAS demonstrates how the application scheme follows a design-led approach to optimise the site capacity in terms of development density and residential unit mix. The design-led approach has been informed by stakeholder involvement in the design process including planning and urban design officers as well as Richmond's Design Review Panel.
- 6.20 **Policy D5 Inclusive design** seeks to achieve the highest standards of accessible and inclusive design in new development, and requires an Inclusive Design Statement to be included in Design and Access Statements. The DAS prepared by the scheme architects incorporates an Inclusive Design Statement (see section 5.11).
- 6.21 **Policy D6 Housing quality and standards** requires all housing development to meet a range of qualitative and quantitative standards including minimum spatial areas for all tenure of accommodation. The annotated floor plans and DAS shows the scheme exceeds all relevant standards including minimum unit room and amenity space standards. The proposed site sections confirm the scheme meets minimum floor to ceiling standard.
- 6.22 **Policy D7 Accessible housing** seeks to ensure that new residential development includes a suitable range of housing to meet the needs for of disabled people, older people and families with young children including 10 per cent meeting M4 (3) 'wheelchair user dwelling' specifications and all other dwellings being M4(2) 'accessible and adaptable dwellings'. The scheme provides 3 M4(3) dwellings (11%) – all other dwellings being M4(2) compliant.
- 6.23 **Policy D9 Tall buildings** requires Development Plans to define a tall building for specific localities – which should be no less than 6 storeys – and identify any location within a borough where tall buildings may be an appropriate form of development. In line with the London Plan, the borough of Richmond upon Thames has developed a local definition of a tall building for the borough. A tall building is defined as: "Buildings which are 7 storeys or over, or 21m or more from street level to the top of the building, whichever is lower". As such, the existing building falls within the definition of a tall building but the proposed building does not.
- 6.24 **Policy D11 Fire Safety, security and resilience to emergency** requires development proposals to minimize potential physical risks, including those arising as a result of extreme weather, fire, flood and related hazards.

- 6.25 **Policy D12 Fire safety** requires all major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third-party, suitably qualified assessor. The proposed development is supported by a Fire Statement as required by policy D 12. The proposed building comprises 5-storeys (17 metres in height) and is not considered to be a high risk building.
- 6.26 **Policy D14 Noise** requires new residential development to mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development as well as improving and enhancing the acoustic environment and promoting appropriate soundscapes.
- 6.27 The Acoustic Appraisal and Planning Compliance Report confirms that the proposed mitigation measures would be sufficient to protect the proposed residential properties from external noise intrusion, and to achieve internal noise conditions for the residents which would be commensurate to all current Standards.
- 6.28 **Policy H1** requires local authorities to increase housing supply. **Policy H2** requires boroughs to pro-actively support well-designed new homes on small sites (below 0.25 hectares in size) in order to increase significantly the contribution of small sites to meeting London's housing needs. The application site falls within the definition of a small site. As such, it is precisely the sort of site identified in Policy H1 and H2 as suitable to significantly increase housing supply.
- 6.29 **Policy H4** sets a strategic target for 50% of all new homes delivered across London to be genuinely affordable by requiring major developments which trigger affordable housing requirements to provide affordable housing through the threshold approach. Footnote 50 states *"all major development of 10 or more units triggers an affordable housing requirement. Boroughs may also require affordable housing contributions from minor housing development in accordance with Policy H2 Small sites."* The application site falls above the threshold for 'applicable sites'.
- 6.30 **Policy H5 Threshold approach to applications** requires a minimum of 35% affordable housing as a percentage of the gross residential development of a site. This application seeks to provide 100% affordable housing comprising 56% social rent and 44% intermediate affordable housing. As such, the application exceeds the strategic target of Policy H4 and specific policy requirement of Policy H5.
- 6.31 **Policy H6 Affordable housing** tenure requires an affordable housing split of 30% minimum low-cost rent (London Affordable Rent or Social Rent) and 30% minimum intermediate affordable housing. The schedule of accommodation (paragraph 5.2) confirms the scheme provides 56% Social Rent (15 units) and 44% Intermediate affordable housing (London Living Rent and Shared Ownership).
- 6.32 **Policy H10** recommends that housing schemes should generally consist of a range of unit sizes and the specific mix of unit sizes should have regard to:
- 1) *Robust local evidence of need;*
  - 2) *The requirement to deliver mixed and inclusive neighbourhoods;*
  - 3) *The need to deliver a range of unit types at different price points across London;*
  - 4) *The mix of uses in the scheme;*
  - 5) *The range of tenures in the scheme;*
  - 6) *The nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity;*
  - 7) *The aim to optimise housing potential on sites;*
  - 8) *The ability of new development to reduce pressure on conversion, subdivision and amalgamation of existing stock;*

9) *The need for additional family housing and the role of one and two bed units in freeing up existing family housing.*

- 6.33 The LPA's pre-application response confirms the scheme provides affordable housing in the borough where there is a defined need and is therefore supported in principle and would accord with Policy LP36 of the Local Plan, subject to further clarification regarding existing floorspace and exploring funding, to ensure the affordable housing offer is maximised to meet local needs. The scheme comprises a mix of unit sizes. The DAS confirms that the design-led approach responds to the townscape and heritage context in terms of form and massing which, in conjunction with the nature of the site, has largely defined the number and size of units provided. As such, the scheme complies with policy H10.
- 6.34 **Policy S4 Play and informal recreation** requires development proposals for schemes that are likely to be used by children and young people to increase opportunities for play and informal recreation, and incorporate good-quality, accessible play provision for all ages (at least 10 square metres of playspace should be provided per child). The Landscape Report and child yield calculator confirm that the scheme exceeds the policy requirement in terms of quantity and quality of playspace.
- 6.35 **Policy T6 Parking** requires car parking to be restricted in line with levels of existing and future public transport accessibility and connectivity. Sub-section B confirms that 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 states that an absence of local on-street parking controls should not be a barrier to car-free development. Policy T6 states further that car-free development should still provide disabled persons parking in line with Part E of the policy.
- 6.36 **Policy T6** represents a significant change in the policy approach to car parking provision between the London Plan and Richmond-upon-Thames Local Plan. Since the London Plan was adopted more recently than the Local Plan, the restrictive approach to car parking provision required by the London Plan takes precedence over the adopted Local Plan parking standards which seeks the provision of the maximum parking standard as a minimum outside areas of mixed use. The draft Local Plan seeks to amend the borough's parking policy to encourage 'car-free' and 'car-lite' development in certain circumstances.
- 6.37 **Policy T6.1 G** requires development proposals delivering ten or more units to provide, as a minimum, at least one designated disabled persons parking bay per dwelling from the outset for three per cent of dwellings. The scheme seeks to ensure compliance with this policy by the provision of 3 on-site disabled car parking spaces easily assessable to three M4(3) wheelchair accessible units located on the ground floor.

**Richmond-upon-Thames Adopted Local Plan**

- 6.38 The site does not fall within any specific area designation defined by the Local Plan. The following generic Local Plan policies as relevant to consideration of the proposed residential redevelopment:
- 6.39 **Policy LP 1 – Local Character and Design Quality** requires new development to respect the local environment and character having regard to height, scale, massing, density, space between buildings, sustainable design and construction etc. The DAS confirms that the proposed development respects the local environment and character of the area.
- 6.40 **Policy LP 2 – Building Heights** requires new buildings to generally reflect the prevailing building height within the vicinity. Where new buildings are taller than the surrounding townscape they must be of high architectural design quality and standards, deliver public realm benefits and have a positive impact on the character and quality of the area. The form, height and scale of development in the locality varies greatly. The proposed building height is lower than the existing

building. The proposed site elevations and site sections show the difference in height and scale between the existing and proposed building, and demonstrate how the proposed height, scale, massing as well as the proposed layout, orientation and separation distances all respect the prevailing character of the area.

- 6.41 **Policy LP 3 – Designated Heritage Asset** requires development to conserve and, where possible, take opportunities to make positive contribution to the historic environment of the borough. The DAS and Historic Environment Desk-Based Assessment confirm that the proposed development would enhance the character and setting of the neighbouring Buildings of Townscape Merit (4-6 Cromwell Road).
- 6.42 **Policy LP 8 – Amenity and Living Conditions** requires all new development to protect the amenity and living conditions of occupiers of existing adjacent properties and new residential dwellings in terms of sunlight and daylight, privacy, noise and sense of enclosure, visual intrusion and overbearing impact as well as reasonable enjoyment of existing or proposed external amenity space.
- 6.43 The application is supported by a Daylight and Sunlight Assessment which undertook detailed analysis of the development. It confirms that the scheme will have a low impact on light receivable by its neighbouring properties and as such complies with BRE guidance. The application drawings and DAS show that the separation distances between the proposed development and neighbouring dwellings are such that there would be no adverse impact in terms of privacy, outlook, visual intrusion or sense of enclosure having regard to the townscape context.
- 6.44 **LP 10 Local Environmental Impacts, Pollution and Land Contamination** seeks to ensure that local environmental impacts of development does 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. The application is supported by a number of environmental assessments including an Acoustic Report, Air Quality Assessment, Energy and Sustainability Report, Whole Life Carbon Assessment and Health Impact Assessment that confirm the scheme will not have a detrimental effect on existing residents of the locality or future occupants of the development.
- 6.45 **Policy LP15 Biodiversity** encourages the creation and incorporation of new bio-diversity features and habitats into new development and where development will impact on existing habitat, to mitigate or compensate for any harm or loss. The Ecology Report confirms that the development will not significantly impact on existing habitats and the Landscape Plan incorporates a range of biodiversity mitigation/enhancement features as recommended in the Ecology Report.
- 6.46 **Policy LP 16 – Trees Woodland and Landscape** seeks to resist the loss of trees unless dead, dying or dangerous, or where a tree is causing significant damage to neighbouring structures; or has little or no amenity value; or for reasons of good arboricultural practice.
- 6.47 The application is supported by an Arboricultural Impact Assessment including Tree Survey Schedule and Tree Protection Plan. The scheme involves the removal of six individual trees and one group of trees – none of which are trees identified as trees of high amenity value or making an essential contribution to the streetscene. The proposed development would not have any adverse impact on trees to be retained on the application site or on trees on neighbouring sites, as identified in the Arboricultural Tree Survey Schedule. The Arboricultural Constraints Plan and planning drawings confirm the proposed construction constraints and mitigation measures to ensure no harm will be caused to these trees as a result of the development.
- 6.48 **Policy LP 17 Green Roofs and Walls** encourages – where feasible – the incorporation of green and/or brown roofs into all new major development. Due to the contemporary design approach, the scheme offers a significant opportunity to incorporate green roofs. As such, the scheme seeks to maximise the provision of green roofs as an integral part of the



design-let approach comprising 361 square metres in total and contributing positively to the site's biodiversity and Urban Greening Factor.

- 6.49 **Policy LP 20 – Climate Change Adaptation** requires new development to be designed to minimise the effects of overheating and minimise energy consumption. The energy strategy set out in the Energy and Sustainability Report, in conjunction with the Overheating Report confirm the proposed development complies fully with Policy LP 20.
- 6.50 **Policy LP 21 – Flood Risk and Sustainable Drainage** requires the use of Sustainable Urban Drainages Systems (SuDS) in all new development achieving greenfield run-off rates wherever feasible, or where greenfield run-off rates are not feasible, at least a 50% attenuation of the site's surface water run-off at peak times based on the levels existing prior to the development. The SuDS Strategy demonstrates that the proposed SuDS components would be viable for the surface water drainage strategy for the site, in order to achieve the targeted discharge rates, whilst mitigating flood risk to the site and surrounding area. The proposals will result in a reduction of combined flows of 92% from the pre-development scenario for the 1 in 100-year event.
- 6.51 **Policy LP 22 – Sustainable Design and Construction** requires new major residential developments to achieve zero carbon standards in line with the London Plan, to achieve maximum water consumption of 110 litres per person per day and connect to existing DE networks where feasible. Paragraph 6.3.12 confirms A 'zero carbon home' is one where at least 35% of regulated CO<sub>2</sub> emissions reductions are achieved on-site, with the remaining emissions (up to 100%) to be off-set through a contribution into the Council's Carbon Off-set Fund. The Energy and Sustainability Statement and DAS (Section 5.14) confirm the development will achieve 45.05% reduction over Building Regulations Part L1A; 35.88% reduction in CO<sub>2</sub> emissions and CO<sub>2</sub> sequestration through the provision of energy efficiency measures; 5.88% reduction of predicted carbon emissions through the use of small-scale renewable energy technologies; and achieves an A+ rating assessed against the LBRUT Sustainable Construction Checklist 2020.
- 6.52 The Water Use Calculator appended to the SUDs Report confirms the proposed development will achieve a maximum water consumption of 106 litres per person per day. The scheme comply fully with Policy LP22 in terms of carbon emission reduction and water consumption, and the supporting documents provide detailed justification in respect of existing DE network connection.
- 6.53 **Policy LP 23 Water Resources and Infrastructure** requires new major residential development ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve the development. The FRA and SUDs Strategy Report and Utilities Desk-Top Search confirm there is adequate water and drainage capacity to meet the needs of the development.
- 6.54 **Policy LP 24 – Waste Management** requires all new development to provide adequate refuse and recycling storage space and facilities in accordance with the Council's SPD. The annotated floor plans and DAS demonstrate how the scheme complies with the Council's requirements for refuse and recycling storage provision. The LPA's pre-application response letter confirms the proposed storage provision complies with the Local Plan policy requirement.
- 6.55 **Policy LP 30 Health and Wellbeing** requires a Health Impact Assessment to be submitted with all major development proposals. The application is supported by a Health Impact Assessment prepared by Hodkinson Consulting, demonstrating that the proposed development will have either a positive or neutral impact on the future residents and those in the surrounding area.

- 6.56 **Policy LP31 – Public Open Space, Play Space, Sports and Recreation** requires all major development proposals to provide an analysis of existing open space provision to ensure adequate provision; provide play space in accordance with a child occupancy assessment; and assess the need and feasibility for on-site provision of new playing fields and ancillary sports facilities. Paragraph 8.4.8 of the supporting text states that *“new major developments may lead to increases in usage and may therefore put an additional burden and pressure on the capacity of the existing provision.”*
- 6.57 The GLA Population Yield Calculator for the development is set out in the Public Open Space Assessment. . It confirms the scheme generates a total population yield of 56.1 persons. The existing building comprises 12 studio and 12 one bedroom flats which generates a total population yield of 38.1 persons (assuming market or intermediate housing). Hence, the proposed development would generate a population uplift of 18 persons.
- 6.58 Furthermore, in accordance with the Council’s Housing Allocation Scheme, applicants for social housing are likely to be placed on the lower eligibility band if they have not been resident within the borough for a continuous minimum period of three years immediately preceding their application. These units are unlikely, therefore, to be occupied by new residents of the borough or to put any additional burden or pressure on the borough-wide provision of public open space or recreational facilities.
- 6.59 The site is not located within 400 metres (5 minutes walking distance) of a designated public open space and as such it is nominally located within an ‘area of public open space deficiency’, as identified on the Local Plan Policies Map. However, the Public Open Space Assessment demonstrates that the site is located with 1200 metres of an extensive range of playing fields, parks, and other green spaces including Udney Park Playing Fields (3 minute walk), Bushy Park (8 minute walk) and Udney Hall Gardens (11 minute walk) as well as Langdon Park, Ham Common and the River Thames.
- 6.60 The child yield and play space needs of the development are also included in the Public Open Space Assessment (page 5) which calculates the total population of the development at 56.1 persons and the child yield at 17.1 children (8 under five, 5.8 under twelve and 3.3 between 12-17 years). The Landscape Plan shows adequate provision in excess of the requirement for on-site under 5 year-old play provision has been incorporated in the scheme layout.
- 6.61 The site is located within 1200 metres of Bushy Park Park, UCL sports grounds, St Mary’s University sports grounds, Teddington swimming pool, Teddington tennis club, NPL sports grounds, the River Thames and Home Park which provide an extensive range of play and sports facilities for 12+ age groups. Public open space, playing fields and other sports facilities located 15 minutes walking distance of the site provide an abundance of high quality provision for 5-17 year-olds.
- 6.63 **Policy LP 34 New Housing** confirms the borough’s target of 3,150 new homes to be built between 2015-2025 of which approximately 650-700 units are to be built in Teddington and the Hamptons.
- 6.64 **Policy LP 35 – Housing Mix and Standards** states that development should generally provide family-sized accommodation - except in the borough’s main town centres or Areas of Mixed Use – and the housing mix of all new development should be appropriate to the site-specifics of the locality.
- 6.65 The proposed development incorporates a mixture of unit sizes appropriate to the site-specifics of the locality and proximity to Teddington town centre and railway station, as follows:
- 1 bedroom 16 units (59.3%)
  - 2 bedroom 9 units (33.3%)
  - 3 bedroom 2 units (7.4%)

- 6.66 It should be noted that **draft Local Plan Policy 13 – Housing Mix and Standards** states that development within 800m distance of a station or town centre boundary should provide a higher proportion of small units (studios and 1 beds) with affordable housing mix based on discussions with a Registered Provider(s) to reflect local needs. The draft policy indicates the ‘direction of travel’ in terms of housing mix and location development with a higher proportion of smaller units. The site is located within 800m of Teddington town centre boundary and train station and complies with the borough’s most up-to-date assessment of appropriate locations for development based on a higher proportion of small units.
- 6.67 Policy LP 36 Affordable Housing expects 50% of all housing units will be affordable housing, comprising a tenure mix of 40% of the affordable housing for rent and 10% of the affordable intermediate housing. Sub-section (b) states that the affordable housing mix should reflect the need for larger rented family units and the Council's guidance on tenure and affordability, based on engagement with a Registered Provider to maximise delivery.
- 6.68 The existing building comprises 24 self-contained residential units (12 studio flats and 12 one bedroom flats) that are unencumbered by tenure restrictions.
- 6.69 The proposed development comprises 27 affordable residential units (100%) and seeks to provide a mix of affordable housing mix to meet the needs of the locality as assessed by RHP in consultation with the Council’s Housing Department. The proposed tenure mix exceeds the expectations of policy LP 36, as follows:

Social Rent	15 units	(56%)
London Living Rent (Intermediate)	6 units	(22%)
Shared Ownership (Intermediate)	6 units	(22%)

- 6.70 **Policy LP 44 – Sustainable Travel Choices** promotes safe, sustainable and accessible transport solutions which seek to ensure that new development does not have a severe impact on the operation, safety or accessibility to the local or strategic highway network. The Transport Statement confirms the site’s highly sustainable location with access to various sustainable travel mode options including Teddington mainline railway station. The scheme is ‘car-lite’ and the Transport Statement outlines a Travel Plan Statement to be prepared and implemented by RHP, as required. It is considered that residents would travel to and from the site by sustainable modes of transport in accordance with Policy LP 44.
- 6.71 **Policy LP 45 – Parking Standards and Servicing** requires new development to provide parking in accordance with the standards set out in Appendix 3. The Transport Statement confirms that the proposed development complies fully with the Local Plan policy requirements for sustainable development in terms of sustainable travel choices, parking and servicing. It demonstrates that the proposed development will result in a net improvement in highway safety in accordance with the Local Plan transport policies.

#### Summary

- 6.72 The proposed development has been assessed against all relevant Development Plan policies, SPD and supplementary guidance. The application has been prepared in consultation with the LPA and Richmond DRP. The scheme is supported by a range of technical reports and appraisals demonstrating its compliance with all relevant policies in the Development Plan.

## 7. KEY PLANNING CONSIDERATIONS

### Background

- 7.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 and section 70 (2) of the Town and Country Planning Act 1990 requires planning applications be determined in accordance with an up-to-date Development Plan unless material considerations indicate otherwise.
- 7.2 The main principles in determining whether a proposal is "in accordance with the plan" have been established by planning case law, the most relevant being cited below:
- The section 38(6) duty can only be properly performed if the decision-maker establishes whether or not the proposal accords with the development plan as a whole: *BDW Trading Ltd. v Secretary of State for Communities and Local Government* [2016] EWCA Civ 493.
  - Development Plan policies can "pull in different directions", i.e. some may support a proposal others may weigh against it: *R v Rochdale Metropolitan Borough Council, ex parte Milne* [2000] EWHC 650.
  - A decision maker is required to assess the proposal against the potentially competing policies and then "decide whether in the light of the whole plan the proposal does or does not accord with it": *City of Edinburgh Council v Secretary of State for Scotland* [1997] 1 W.L.R. 1447
  - It is not a mathematical or mechanical exercise. It is not a question of counting: *Dignity Funerals Limited v Breckland District Council* [2017] EWHC 1492 (Admin)5.
  - The balancing exercise calls for a series of judgments to be made, which may include determining the relative importance of the policy, the extent of any breach and how firmly the policy favours or set its face against such a proposal: *R v Rochdale Metropolitan Borough Council, ex parte Milne* [2000] EWHC 650.
  - A development that accords with the policies in the Local Plan cannot be said to depart from the plan because it failed to satisfy additional criteria referred to only in the supporting text: *R (Cherkley Campaign Ltd) v Mole Valley District Council* [2014].

Even if an application is deemed to have breached one or more Development Plan policies the proposal must still be assessed in respect of the statutory 'planning balance' within s.38(6) of the Planning and Compulsory Purchase Act 2004.

### Introduction

- 7.3 The application seeks full planning permission for the redevelopment of a seven-storey building to provide 27 new residential dwellings within a five-storey building. The design-led proposals for the redevelopment of Sheldon House will enhance the character and appearance of the townscape by replacing a 'tall building' as defined by the Council with a more appropriate building in terms of its height, scale, orientation and density, and make a positive contribution to meeting the borough's affordable housing need.
- 7.4 The site falls within the definition of 'previously developed land'. It falls within a predominantly residential area – a mixture of houses and purpose-built blocks of flats – and is located close to Teddington town centre and train station.
- 7.5 The application is supported by a wide range of technical surveys, appraisals and reports which confirm that the proposed development complies with all relevant environmental, sustainability and infrastructure policies in the

Development Plan. The scheme has also been assessed positively against all relevant design standards in terms of sustainable design and construction, housing quality and architectural quality.

- 7.6 The key planning considerations relating to the proposed redevelopment of the site and the creation of new residential accommodation are addressed in this section.

#### The Planning Balance

- 7.7 In considering the ‘planning balance’ the importance and relevance of planning benefits – particularly the regeneration, environmental and community benefits of the proposals – should not be overlooked. The benefits arising from this development are substantial and summarised below:

- Demolition of a building with significant structural defects and poor environmental credentials;
- Erection of sustainable design-led building which relates more sensitively to the context thereby enhancing the townscape and improving the setting of the neighbouring locally listed building;
- Residential redevelopment will achieve high standards of sustainable development than the existing building including:
  1. Sustainable design construction;
  2. Renewable energy consumption;
  3. Accessibility;
  4. housing quality standards;
  5. sustainable modes of transport;
  6. healthy living.
- The provision of affordable housing to meet an identified local need;

- 7.8 Uppermost in this list of benefits must be the community benefits – the provision of 27 new affordable homes to help meet the urgent housing need in the borough, which must be balanced against any perceived short-comings.

#### Demolition of Sheldon House

- 7.9 The principle of redevelopment is supported by **Richmond Local Plan (RLP) policy LP38** and **London Plan (LP) Policy H8** which require replacement housing at existing or higher densities with at least the equivalent level of overall floor space, including an uplift in affordable housing wherever possible. Optimising the site capacity through a design-led approach that responds more sensitively to the existing character of a place and provides higher quality architecture, incorporating higher sustainability and environmental standards, is also supported by **LP policy D3**.

- 7.10 The proposed height, scale and massing will respect and strengthen the local townscape and setting of a designated heritage asset. As such, the proposal is supported by **RLP policies LP1, LP2 and LP4**.

- 7.11 Redevelopment will enable new development to minimise energy consumption and minimise the effect of overheating in accordance with **RLP policy LP20**, reduce flood risk in accordance with **policy LP21**, and reduce carbon dioxide emissions and water consumption in accordance with **policy LP 22**.

#### Provision of Affordable Housing

- 7.12 The Local Plan identifies affordable housing provision as a “key priority of the Plan” with the Council’s Strategic Objective setting out a requirement to “pursue all opportunities to maximise affordable housing across the borough through a range of measures including providing more choice in the different types of affordable housing and different levels of availability”.

- 7.13 Furthermore, **Policy LP 36** sets out the affordable housing policy and paragraph 9.3.1 identifies that the Borough Strategic Market Housing Assessment dated December 2016 identified a net deficit of 964 affordable homes per annum between 2014 to 2033, thus identifying that the need for affordable homes in the borough remains “substantial”.
- 7.14 The LPA’s pre-application response confirms the benefits of redevelopment to meet the borough’s urgent affordable housing need, subject to other policy considerations. As such, consideration of the strategic objective and the affordable housing policy need to be given ‘significant weight’ in the application process.

**Tenure and Mix**

- 7.15 Planning permission was granted in 1967 (reference 66/1108) for development at 8 Cromwell Road comprising the erection of a 7-storey block of 24 flats, 7 garages and the provision of 17 parking spaces.
- 7.16 The Sheldon House application comprised ‘council’s own development’ and as such, the tenure was unrestricted by the planning permission. The existing accommodation comprises a mix of studio and one bedroom flats which do not meet current residential space standards or environmental and sustainability standards. The tenure mix of Sheldon House includes 7 leasehold market housing units which are currently being acquired by RHP – the remaining 17 units being social rent. RHP is currently negotiating the purchase of all leasehold units and working with their existing tenants to provide alternative accommodation or temporary rehousing during the period of construction.
- 7.17 The scheme provides a mix of unit sizes to address local housing need. In particular, Richmond’s most up-to-date housing needs assessment which forms part of the evidence base for the draft Local Plan confirms a greater need for smaller affordable housing units and the lack of future supply of small intermediate 1-2 bedroom affordable units.
- 7.18 Consistent with the requirements of **LP policy H10** to deliver a range of unit types at different price points and a mix of unit sizes to accommodate the needs of both young and old people, the scheme includes a mix of one-bedroom units as well as larger family-sized two- and three-bedroom units.
- 7.19 The proposed tenure will be 100% affordable housing, comprising at least 56% Social Rent units with the remainder to be provided as Intermediate Affordable Housing. As such, the proposed tenure exceeds the policy requirement of **Richmond Local Plan policy LP38** and **London Plan (LP) Policy H8** in terms of providing an uplift in overall affordable housing.
- 7.20 The scheme exceeds the tenure mix requirements of **RLP policy LP36** and **LP policy H4** and provides a greater mix of unit sizes than the existing building. As such, the scheme complies fully with the development plan policy expectations in terms of tenure and mix.

## 8. CONCLUSIONS

- 8.1 The site comprises 'previously developed land' in an established residential settlement. It is located within easy walking distance of a range of sustainable modes of public transport, public services and local community facilities.
- 8.2 Sheldon House was constructed in 1967 with the benefit of planning permission unencumbered by any requirement for the provision of affordable housing.
- 8.3 This scheme offers a clear opportunity to make more efficient use of under-utilised site in a highly sustainable location to deliver high quality, energy efficient housing and help meet the borough's identified local affordable housing need.
- 8.4 Having regard to the prevailing character and the policy requirement for residential schemes to optimise the development potential of sites in areas such as this, it has been demonstrated that the site can accommodate the proposed scale and form of development which are considered to be more appropriate to the context than the existing building.
- 8.5 The development provides an inclusive, design-led scheme that is attractive to look at and will enhance the visual quality of the locality as well as the setting of the adjacent BTMs. It responds innovatively to the site constraints whilst seeking to optimise an appropriate and sustainable form of development.
- 8.6 The scheme has been subjected to a comprehensive community engagement including pre-application consultation with existing residents, the local planning authority, Richmond Design Review Panel and the local community.
- 8.7 This statement demonstrates that the application has been prepared and amended in the context of and informed by pre-application discussions with these stakeholders.
- 8.8 The application is supported by a large number of technical surveys, appraisals, reports addressing planning matters including Design & Access, Transport, Sunlight and Daylight, Sustainable Urban Drainage, Ecology and Energy/Sustainability. The supporting documents demonstrate the scheme complies fully with all relevant environmental policies in the Development Plan.
- 8.9 The supporting documents also demonstrate that the proposed development would not cause any unacceptable impact on the residential amenity of existing neighbouring properties and would not put an additional burden and pressure on the capacity of the existing provision of local services, community facilities, open space or recreation facilities.
- 8.10 Planning legislation requires planning applications to be determined in accordance with an up-to-date development plan unless material considerations indicate otherwise. The development plan is up-to-date and a review of relevant policies confirms the scheme complies fully within all applicable Strategic and Local Plan policies. In accordance with NPPF paragraph 11 the development should be approved without delay.