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Via Planning Portal only

22nd March 2024

Dear Sir/Madam

FULL PLANNING APPLICATION - THE TOWN & COUNTRY PLANNING ACT 1990

ALTERATIONS TO SITE LAYOUT INCLUDING THE REMOVAL, ADDITION AND REORIENTATION OF COURTS, REMOVAL AND ERECTION OF LIGHTING COLUMNS, REMOVAL AND ERECTION OF COURT ENCLOSURES AND NETS, PARTIAL DEMOLITION AND EXTENSION OF THE EXISTING RETAINING WALL AND THE ERECTION OF OPEN SIDED CANOPIES IN ASSOCIATION WITH THE TENNIS/ MINI-RED JUNIOR TENNIS, PICKLEBALL AND PADEL TENNIS USE AND ASSOCIATED WORKS.

LENSBURY CLUB, BROOM ROAD, TEDDINGTON, TW11 9NU.

Please accept this covering letter as an accompaniment to this full planning application for the proposed development at Lensbury Club, Broom Road, Teddington, TW11 9NU ('the site'). This letter provides a summary of the site and the proposed development.

Please also find enclosed a completed application form, community infrastructure levy questions form, existing and proposed plans, lighting details, flood risk assessment and drainage strategy, desktop archaeological appraisal, arboricultural impact assessment and a highways statement.

The Site:

The application site comprises an outdoor sports facility, which is part of a wider leisure club. The wider site extends to approx. 9.8 hectares, divided between 8.7 hectares on the eastern side (riverside site) of Broom Road and 1.1 hectares on the western side (roadside site).

The application site is located on the south side of Broom Road, comprising part of the club's existing tennis courts. The site currently comprises two tennis courts and 3 mini-red junior tennis courts. The site is within the Thames Policy Area and is part of an area of land designated as Metropolitan Open Space. The site is not located within a conservation area or within the setting of any listed buildings and is within Flood Zone 3 and an archaeological priority area.

Planning History:

88/1327 – Erection of 16 No. 6 metre high floodlighting columns around Tennis Courts and Bowling Green. (Additional lights specification received on 5.7.88) – granted permission on 17/08/1988.

04/2517/FUL – Change of use of bowls green to tennis courts, together with new car parking and relocation of existing floodlights and tennis wall. Erection of one new floodlight – granted permission on 26/10/2004.

10/2152/FUL – Replacement of existing floodlights and columns to existing tennis courts – granted permission on 16/09/2010.

23/1815/PS192 – Change of use of land for tennis and mini-red junior tennis to tennis, mini-red junior tennis, pickleball and padel tennis – certificate issued 08/08/2023.

23/P0192/PREAPP – Alterations to site layout including the removal, addition and reorientation of courts; removal and erection of lighting columns, removal and erection of court enclosures, part demolition and extension of the existing retaining wall and the erection of stands in association with the tennis/ mini-red junior tennis, pickleball and padel tennis use. – Advice provided 05/10/2023.

The advice concluded that the principle of the application is generally acceptable.

The Proposal:

The proposal seeks the removal of a tennis court, the re-orientation of the second tennis court, re-siting of the 3 mini-red junior tennis courts with the inclusion of pickleball markings and the creation of 2 new padel tennis courts with associated lighting and boundary treatments. Localised re-grading and extension of retaining wall and erection of canopies.

Planning Policy:

National Planning Policy

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. At the heart of the NPPF is a presumption in favour of sustainable development which incorporates three specific strands – economic, environmental and social. The following sections are relevant to the consideration of this application; Section 8 (promoting healthy and safe communities, Section 12 (achieving well designed places), Section 13 (protecting green belt land), Section 14 (meeting the challenge of climate change, flooding and coastal change) and Section 16 (conserving and enhancing the historic environment).

Local Planning Policy

For the purposes of this application, the adopted Development Plan for the London Borough of Richmond upon Thames comprises of the London Plan (2021), the Richmond Local Plan (2018) and the supporting Supplementary Planning Documents (SPDs). Richmond have reached regulation 19 stage on their emerging Local Plan, currently only limited weight can be given to the policies in the emerging local plan, greater weight can be given as the plan moves towards adoption. The following policies are considered relevant to this proposal:

London Plan (2021)

- Policy D4 – Delivering Good Design
- Policy D11 – Safety, Security and Resilience to Emergency
- Policy D12 – Fire Safety
- Policy HC1 – Heritage Conservation and Growth

Local Plan (2018)

- Policy LP1 – Local Character and Design Quality
- Policy LP7 – Archaeology
- Policy LP13 – Impact on Metropolitan Open Land
- Policy LP15 – Impact on Biodiversity
- Policy LP16 – Impact on Trees, Woodland and Landscape
- Policy LP21 – Impact on Flood Risk and Sustainable Drainage
- Policy LP44 – Sustainable Travel Choices
- Policy LP45 – Parking Standards and Services

Supplementary Planning Documents (SPDs)

- Transport
- Hampton Wick and Teddington Village Plan

Planning Assessment:

Principle of development

London Plan Policy G4 states that development proposals should not result in the loss of protected open space. Policy S5 sets out that development proposals for sports and recreation facilities should enhance the provision of facilities in accessible locations, maximise the multiple use of facilities and support provision of sports lighting, within reasonable hours, where there is an identified need for sports facilities and lighting is required to increase their potential use.

Local Plan Policy LP28 states that the Council will work with service providers to ensure the adequate provision of community services and facilities. Policy 31 encourages improvements to existing facilities.

The London Borough of Richmond Upon Thames Playing Pitch and Outdoor Sports Strategy (2023) sets out that whilst there is demand for tennis courts, there are no publicly accessible padel tennis courts in the Borough. The strategy also sets out that the majority of the borough's courts have a macadam surface and that Lensbury Club are not experiencing capacity issues. The strategy acknowledges a growing demand for padel tennis courts and recommends that opportunities are explored to add to the stock of padel courts and seek to maximise activity.

The proposal is for the reconfiguration and improvement of the existing court facilities, for the benefit of the members of the Lensbury Club. The proposal would result in the loss of 1 of the 8 macadam courts the club currently has and the diversification of the court offer to incorporate pickleball and padel tennis.

Overall, the proposal results in a net gain of 1 court. In this context, the loss of a single tennis court would not materially impact the tennis court capacity at the club and will provide members an opportunity to partake in pickle ball and padel tennis, both of which are not currently on offer at the club.

The benefit of an additional court and a diversified racket sport offer clearly outweighs the limited harm associated with the loss of a single macadam tennis court. The proposed courts meet Sport England standards. There are no national or local planning policies that render the general principle of the proposed development unacceptable, subject to the proposal being acceptable in light of all other material planning considerations. An assessment of these considerations is set out below.

Design, visual and metropolitan open land impacts

London Plan Policy G3 states that metropolitan open land is afforded the same status and level of protection as Green Belt and be protected from inappropriate development in accordance with the national planning policy tests that apply to the Green Belt.

Paragraph 152 of the NPPF sets out that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 153 sets out that decision makers should give substantial weight to any harm to the Greenbelt and that very special circumstances would not exist unless the potential harm by reason of inappropriateness and any other harm is clearly outweighed by other considerations. Paragraph 154 sets out that the provision of appropriate facilities for outdoor sport are exempt from being inappropriate development in the Green Belt, as long as they preserve the openness of the Green Belt.

Policy LP1 advises that the Council will require all development to be high quality architectural and urban design quality. Policy LP13 sets out that metropolitan open land will be protected and retained in predominately open use. Appropriate uses in the metropolitan open land are identified as open recreation and sport, among others.

The proposed improvements and re-configuration of the courts include further division of the courts with visually permeable court enclosures, re-siting of existing lighting units and installation of new lighting units. The proposed court enclosures, lighting, canopies and netting would not result in materially different openness impacts than that which currently exist. The proposed canopies are low level, visually permeable and would be viewed in the context of existing boundary treatments and hard surfacing.

The proposal is appropriate development in the greenbelt that preserves the openness of the site, in accordance with London Plan Policy G3 and Local Plan Policies LP1 and LP13.

Neighbour impact

Policy LP8 looks to protect the amenity of surrounding neighbours, particularly in relation to daylight and sunlight provision, overlooking, noise disturbance and overbearing impacts.

The proposal is for the diversification of the existing lit court facilities. The application site is not adjacent any residential neighbours. The lighting scheme has been designed to minimise light spill beyond the site boundaries. The proposal would not result in materially different neighbour amenity impacts than that

which currently exist. If deemed necessary, a planning condition could be imposed to restrict the operating times of the lighting. The proposal conforms with the aspirations of Policy LP8 of the Local Plan.

Archaeology

London Plan Policies HC1 states that development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation.

Local Plan Policy LP7 requires development proposals to protect, enhance and promote the boroughs archaeological heritage.

The proposed works are to take place on previously disturbed ground. The proposed development includes very limited ground works associated with erecting posts to support the court nets and boundary enclosures, re-aligning an existing retaining wall and improving court drainage with limited punctuations through the existing hard surface. Whilst it is unlikely that the proposal would disturb below ground archaeological remains of significance, the application is accompanied by a desktop archaeological appraisal. The appraisal confirms that, based on the archaeological evidence available in the area, the archaeological potential of the site is low and the given the previous development that has taken place on the site, the proposal would not harm below ground archaeological remains. The assessment confirms that no further assessment work is required. As such, there would be no conflict with London Plan Policy HC1 or Local Plan Policy LP7.

Flood Risk and Drainage

London Plan Policy D11 advises that development proposals should maximise building resilience and minimise the physical risk of flooding. Policy S113 states that development proposals should aim to achieve greenfield run off rates, to ensure that surface water run-off is managed as close to its source as possible.

Local Plan Policy LP21 sets out that development proposals should avoid or minimise contributing to all forms of flooding, when taking into account of climate change and increasing flood risks elsewhere and that Sustainable Urban Drainage Systems are delivered that seek to achieve greenfield run off rates, where feasible.

The proposal seeks limited reconfiguration of the existing courts with localised repairs and drainage improvements to the existing impermeable surface. The proposal results in a minor intensification of use of the site, through the introduction of an additional court. The application is accompanied by a flood risk and drainage assessment that demonstrates that the proposal would not increase flood risk and that site drainage is improved. The proposal accords with London Plan Policy D11, S113 and Policy LP21.

Ecology and Tree Impacts

Local Plan Policy LP15 seeks to protect biodiversity in the borough. Policy LP16 seeks to protect existing trees.

The proposal includes reconfiguration of existing lighting and installation of new lighting columns. The lighting units are designed to minimise light spillage beyond the site boundaries and therefore any impact on foraging or commuting bats in the area.

There is a single Ash tree located adjacent to the northern boundary of the site and a Cherry Tree to the north western corner of the site. The trees are not understood to be subject to a tree preservation order and therefore is not afforded any statutory protection. The proposed limited ground works are located outside the root protection area of these trees. The Arboricultural Impact Assessment that accompanies the submission confirms that no trees are impact by the proposed development. The proposal accords with Local Plan Policies LP15 and LP16.

Transport and Parking

Policy LP45 sets out that development should make provision for the accommodation of vehicles in order to provide for the needs of the development. The policy refers to parking provision in accordance with appendix 3 which in turn defers to the London Plan (2016). The London Plan (2016) has been superseded by the London Plan (2021) and therefore should form the basis for assessing parking demand in new development.

London Plan Policy T6.4 requires schemes proposing leisure uses in locations of PTAL 0-3, should be assessed on a case by case basis and be consistent with the Healthy Streets Approach, mode share and active travel targets and the aim to improve public transport reliability and reduce congestion and traffic levels.

The site forms part of a the larger Lensbury Club site which has car parks on both sides of Broom Road. The club comprises a 155-bedroom hotel with restaurants, bars, members' lounge, spa, conference centre and a health and fitness complex. Sports provided include tennis, squash, football, rowing, canoeing, sailing and motor boating. The wider site currently has two main car parks, one on each side of Broom Road with capacity for 250 vehicles and over 20 bicycle parking spaces.

The site is located in an area with a PTAL rating of 1b, whilst not the most accessible, the site is in reasonable walking distance Teddington Station and Teddington Lock Bus Stops.

The proposal results in an additional court which would not materially impact the parking and bicycle parking demand for the site or the number of movements there too. The Highways supporting statement that accompanies the application confirms that the proposal would have a negligible impact on the local transport network and the limited uplift in vehicle movements can be readily accommodated within the existing parking arrangements. The proposal would not have an adverse highway safety impact and therefore accords with London Plan Policy T6.4 and Local Plan Policy LP45.

Fire safety

London Plan Policy D12 states that all development proposals should achieve the highest standards of fire safety.

The proposal results in a modest intensification of use of the site, through the addition of a court. The existing access and egress arrangements remain unaltered. The proposed development would not increase fire safety risk. The proposal complies with London Plan Policy D12.

Summary:

As demonstrated within this letter and supporting documents, the proposed works are considered to be acceptable in principle. The proposal diversifies the court offer for the benefit of club members whilst not harming green belt openness, neighbour amenity, highway safety, flood risk, local ecology, the historic environment or fire safety.

The development is in accordance with the Development Plan, and there are no material planning considerations that suggest the proposal should be determined against anything but in accordance with the adopted development plan. It is therefore respectfully requested that planning permission is granted.

I trust this letter and the enclosed documents provide you with sufficient information to determine the application but if you require any points of clarification or have any questions, please do not hesitate to contact me.

Yours sincerely

Stuart Minty
Director
SM Planning