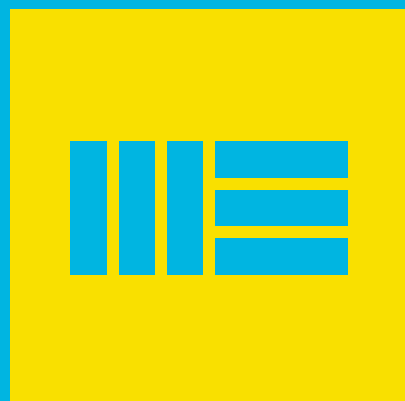


PLANNING STATEMENT

**42 HIGH STREET, TEDDINGTON
TW11 8ES**

ON BEHALF OF UNICO DEVELOPMENTS LIMITED

JUNE 2024



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1.0 EXECUTIVE SUMMARY

- 1.1 This Planning Statement (hereafter referred to as “the Statement”) has been prepared by Montagu Evans LLP to support the submission of an application for planning permission and demolition in a conservation area (referred to as “the / this Application”) for redevelopment at 42 High Street, Teddington, TW11 8EW (“the Site”).
- 1.2 The Application is submitted on behalf of Unico Developments Limited (“the Applicant”) to the London Borough of Richmond Upon Thames (“the Council” / “LB Richmond”) as the Local Planning Authority (“LPA”).
- 1.3 Full planning permission and demolition in a conservation area is sought for (“Proposed Development” / “Scheme”):

“Redevelopment of the site to provide a mixed-use development comprising Class E at ground floor and basement and eight residential units above.”
- 1.4 The Site is located on the corner of Teddington’s High Street (A313) and Cedar Road, within Teddington Town Centre which is one of Richmond’s five Main Centres. Cedar Road, to the east of the Site, is predominantly characterised by two-storey, residential terraced properties. Directly opposite the Site to the east, a public car park is located which is accessed from Cedar Road.
- 1.5 Teddington High Street is a Key Shopping Frontage, largely comprising a mixture of Class E units at ground floor and office or residential over the upper floors. The building height along Teddington High Street is varied. Mid-terraces are typically two to three storeys high, while end of terraces are typically three and four storeys high.
- 1.6 The Site comprises a vacant bank at ground floor, with ancillary space on the first floor. In addition, the Site contains a self-contained flat at first floor level which has its own designated access. The existing building is two-storeys in height with a flat roof, however of a poor architectural quality, offering little to the character and appearance of the High Street and bears no relationship to its context.
- 1.7 The Site is located within the High Street Teddington Conservation Area. The existing building is not designated as statutory or locally listed and is of a low urban design quality which detracts from the character and appearance of the conservation area. The adjacent building at No. 40 High Street is a Building of Townscape Merit (“BTM”). Consequently, the Site’s redevelopment presents a number of planning, design and heritage considerations. These have been carefully considered through pre-application discussions and over a project period of long gestation. The proposals response to these planning considerations is explained in this statement.
- 1.8 The application follows on from the appeal decision on the site for the two refused schemes (ref 19/0511/FUL & 21/0270/FUL). While the Inspector dismissed the appeals on grounds of design, she found all other matters to be acceptable, including the principle of redevelopment and the proposed land uses. The decision provided a detailed commentary and analysis of the conservation area, its characteristics, and an assessment of the proposed design. The applicant has reviewed the Inspector’s comments and revised the proposals to specifically address these.
- 1.9 As noted, the now Proposed Development has also been developed in close consultation with Officers from the LB Richmond and evolved through public consultation with residents and the Teddington Society, to take account of their comments on the revised design. It comprises the following elements:
 - Demolition of existing two storey building and replacement with a three-storey building and a basement;
 - New commercial unit at ground and basement floor levels; and
 - Eight residential units at first to third floor levels.
- 1.10 A suite of technical reports has been prepared and submitted as part of this planning application. This Statement is one of those reports and provides a detailed planning policy analysis, considering the Proposed Development in the light of the relevant policies of the adopted Development Plan, as well as other material considerations.
- 1.11 This Planning Statement demonstrates that the proposed Scheme:

- Has positively evolved in terms of design, massing and scale, since the previous submissions;
- Boosts the supply of housing within the Borough;
- Presents a high-quality design which responds well to the local context and positively impacts the Teddington Conservation Area;
- Provides high-quality residential accommodation in a sustainable location and
- Introduces active frontages at ground floor serving good quality commercial space, in a designated District Centre location.

1.12 Overall, we conclude the Proposed Development is in accordance with national, regional and local planning policy, including other material considerations such as emerging policy and guidance. The Scheme constitutes minor development, which would provide a number of planning benefits over and above the existing situation.

2.0 INTRODUCTION

21 This Planning Statement (“the Statement”) has been prepared by Montagu Evans LLP on behalf of Unico Developments Limited (“the Applicant”) to accompany an application for full planning permission for redevelopment at 42 High Street, Teddington, TW11 8EW (“the Site”). Full planning permission is sought for (“Proposed Development” / “Scheme”):

“Redevelopment of the site to provide a mixed-use development comprising Class E at ground floor and basement and eight residential units above.”

22 The Site falls within the jurisdiction of the London Borough of Richmond Upon Thames (“the Council” / “LB Richmond”) as the Local Planning Authority (“LPA”), within the Teddington Ward and forms part of the Key Shopping Frontage within Teddington Centre. The Site occupies a corner plot, bound by Cedar Road to the East and Teddington High Street to the North.

23 The site spans over an area of 302 sqm (0.03 ha) and the existing building comprises ground floor and one upper storeys (G +1), which provides approximately 44.4 sqm (GIA) of residential floorspace (Use Class C3) and approximately 210.6 sqm (GIA) of commercial floorspace (Class E(c)), at ground floor and first floor in the form of a vacant former bank.

OVERVIEW OF SCHEME

24 The Proposed Development includes the following works:

- Demolition of existing two storey building and replacement with a three-storey building and a basement;
- New commercial unit at ground and basement floor levels; and
- Eight residential units at first to third floor levels.

PURPOSE AND FORMAT OF PLANNING STATEMENT

25 The purpose of this Statement is to provide information in respect of the Scheme, to allow for an informed assessment of the Proposed Development against relevant national, regional and local planning policy and other material considerations.

26 The Statement sets out how the relevant planning policies and all other material considerations to the determination of the Application have been considered in the evolution of the Scheme. It also sets out the extent to which the Application is compliant with all such considerations, to help inform the overall planning balance judgement.

27 The Statement brings together the findings of the technical reports identified in **Table 1.1** below. The scope of supporting information contained within the technical reports has been established with regard to the national and local list requirements. Therefore, this Statement should be read in conjunction with the accompanying documents and drawings submitted with the Application.

Table 1.1 – Schedule of Required Information

DOC NO.	DOCUMENT TITLE	AUTHOR
1.	Document Schedule	Montagu Evans
2.	Application Form	Montagu Evans
3.	Covering Letter	Montagu Evans
4.	Site Location Plan (1:1250)	Chandler Browne Architects
5.	Block Plan (1:100)	Chandler Browne Architects
6.	Drawing Register	Chandler Browne Architects
7.	Application Drawings <ul style="list-style-type: none"> • Existing and Proposed • Floorplans, Elevations and Streetscape 	Chandler Browne Architects
8.	Design and Access Statement	Chandler Browne Architects
9.	Planning Statement	Montagu Evans
10.	Heritage Statement	Montagu Evans
11.	Transport Statement (incl. Travel Plan)	SLR Consulting
12.	Fire Safety Strategy	GM Fire Ltd
13.	Construction Noise Management Assessment	Clement Acoustics
14.	Arboriculture Impact Assessment (incl. Method Statement)	Slyvan Resources Ltd
15.	Archaeological Statement	Chandler Browne Architects
16.	Viability Assessment (incl. Affordable Housing Statement)	Douglas Birt Consulting
17.	Sustainable Construction Checklist	Chandler Browne Architects
18.	Energy Statement (incl. BREEAM Domestic Refurbishment Pre-Assessment)	ERS
19.	Community Infrastructure Levy Form	Montagu Evans
20.	Basement Impact Assessment (incl. Contamination Assessment and Flood Risk Assessment)	Milvum Engineering Services Ltd
21.	Structural Impact Assessment & Construction Method Statement	Green Structural Engineering
22.	Statement of Community Involvement	Cascade Communications Ltd
23.	Daylight, Sunlight & Shading Report	Pro Sustainability Ltd
24.	Preliminary Roost Assessment	Arbtech
25.	Noise Assessment	Clement Acoustics

28 The structure of this Statement is as follows:

- **Section 3** provides background and planning history of the Site and its surrounding context;
- **Section 4** summarises the legislation and planning policy framework relevant to the Site;
- **Section 5** undertakes a review of relevant planning policy;
- **Section 6** assesses the proposals against relevant policy;
- **Section 7** analyses the proposals against the appeal decision; and
- **Section 8** provides a conclusion, in support of the scheme.

29 We conclude that the Scheme would provide a number of planning benefits over and above the existing situation, this includes:

- Boosting the supply of housing within the Borough;
- Presents a high-quality design which responds well to the local context and positively responds to Teddington Conservation Area;
- Provides high-quality residential accommodation in a sustainable location, and;
- Introduces active frontages at ground floor serving good quality commercial space, in a designated District Centre location.

3.0 SITE AND SURROUNDING AREA

SITE AND BACKGROUND

- 31 The Site falls within the administrative authority of the LB Richmond and comprises a former bank (Use Class E(c)) located at the end of an Edwardian terrace on the south side of Teddington High Street. The eastern return is on Cedar Road. The existing building spans two storeys with a flat roof. Public access to the bank is directly from the High Street (A313). The bank is currently vacant and clearly undermines the appearance, character and function of the High Street, the frontage is relatively closed and unwelcoming, the architectural style is dated, and the massing is inappropriate in the context of the area. The Site benefits from a one-bedroom, self-contained flat at first floor level which has separate access from Cedar Road.
- 32 The Site is located within the High Street Teddington Conservation Area (designated in 1982), but the building is not statutory listed or locally listed. The adjacent building at No. 40 High Street is a BTM, as is the rest of this terrace which runs to the west, ending at No. 10 High Street.
- 33 The existing building is of mid-1960s design with no architectural merit and detracts from the character and appearance of the Conservation Area, a finding shared by the Conservation Area Appraisal 'Teddington Lock & High Street Study – CA27 & 37(1995)' and associated summary map, as well as by the Planning Inspector in the appeal decision.
- 34 The surrounding area is predominantly mixed-use, with numerous commercial units on the ground floor along the High Street, and offices or residential uses on the upper floors. The building height along this part of Teddington High Street is generally uniform but in places varied with buildings reaching four storeys. Most of the properties were typically built in the 19th and early 20th Centuries.
- 35 The Site has a PTAL (Public Transport Accessibility Level) of 3, with 6b being the 'best' and 0 the 'worst'. Teddington station is the nearest overground station located 6 minutes' walk away. The station is served by South-Western Railway which operates a loop line to Waterloo. The nearest bus stops are located on the High Street and at Elmfield Avenue and Cambridge Road.

PLANNING HISTORY

- 36 A review of the Council's planning history records has been undertaken. We set out below the relevant history and lawful uses on the site.
- 37 Planning Permission for the existing building, comprising a bank, offices and self-contained flat was granted permission by LB Richmond on 17 August 1964 (ref. 64/0437).
- 38 Following from this, Planning Permission was sought to erect a single-storey rear extension to serve the existing office space (ref. 73/2482). The application was granted permission by LB Richmond on 9 April 1974.
- 39 More recently, Planning Permission (ref. 19/0511/FUL) was sought for the "Demolition of existing building to facilitate the erection of part 4 storey part 3 storey building comprising A3 restaurant use at basement and ground floor and eight residential units (6 x 1 bed and 2 x 2 bed) on upper floors with associated hard and soft landscaping, parking, cycle and refuse stores." This application was refused by LB Richmond on 4 June 2020 and subsequently dismissed at appeal on 14 April 2022.
- 310 The reason for LB Richmond's refusal was based on the proposed development having a prominent corner, massing, height and scale on both frontages and design, giving rise to an unduly obtrusive form of development. Of particular concern was the four-storey element, which was considered harmful to the appearance and character of the Teddington High Street Conservation Area, adjoining street scenes and setting of the adjacent BTM. The proposal was therefore considered contrary to Policies LP1, LP2, LP3 and LP4 of the adopted Local Plan 2018 and Supplementary Planning Documents: 'Design Quality' and 'Small and Medium Housing Sites'.

- 311 Following from this refusal, Planning Permission (ref. 21/0270/FUL) was sought for the “Redevelopment of site to provide a mixed-use development comprising class E at ground floor and basement and eight residential units above”. The application was refused on the same grounds. The Applicant appealed the decision; however, this was also dismissed at appeal by the Planning Inspector on 14 April 2022.
- 312 The appeal was dismissed for both applications (refs. 19/0511/FUL and 21/0270/FUL) for failing to comply with Policies LP1 (Local Character and Design Quality), LP2 (Building Heights) and LP4 (Non-designated heritage assets) of the LB Richmond Local Plan (adopted July 2018). **Section 7.0** of this Statement outlines how the Proposed Development has positively evolved, taking into consideration the comments of the appeal Inspector.

4.0 PLANNING POLICY FRAMEWORK

41 The Scheme has been informed by both adopted and emerging Statutory Development Plan policies and other relevant guidance. This section of the Statement provides a summary of the planning policy framework. **Section 6.0** then provides an assessment of the application against the policies and guidance contained within these documents.

LEGISLATIVE CONTEXT

42 Section 38(6) of the Planning and Compulsory Purchase Act (2004) (As Amended) requires planning applications to be determined in accordance with policies of the Statutory Development Plan and National Planning Policy Statements unless material consideration indicates otherwise. The relevant Statutory Development Plan for this Site is outlined below.

43 Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) provides that, with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a conservation area.

STATUTORY DEVELOPMENT PLAN

The adopted Statutory Development Plan for the Site comprises:

- The London Plan (March 2021); and
- Richmond Local Plan (July 2018).

NATIONAL FRAMEWORK

44 The National Planning Policy Framework (the “NPPF”) was originally published in March 2012, and revised in 2018, 2019 and 2021 with the latest revision published December 2023 by the Ministry of Housing, Communities and Local Government. The NPPF sets out the Government’s economic, environment and social planning policies for England and supersedes the vast majority of previous Planning Policy Guidance Notes and Planning Policy Statements.

45 At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a ‘golden thread’ running through decision-making (Paragraph 11). The NPPF is a material consideration in the determination of planning applications.

46 In addition to the NPPF, Planning Practice Guidance (“PPG”) was first published in March 2014 and has been amended on numerous occasions to reflect national planning policy changes. The PPG outlines how government planning practice should be followed and interpreted in accordance with the principles of the NPPF. Regarding decision making, the guidelines set out in the PPG are a material consideration and accordingly should carry weight in the determining of planning applications.

REGIONAL PLANNING POLICY

47 The London Plan (March 2021), prepared by the Greater London Authority, is the Spatial Development Strategy for Greater London. It sets out a framework for how London will develop over the next 20-25 years and the Mayor’s vision for Good Growth. The London Plan forms the London-wide policy context within which the Boroughs set their local planning agendas, and forms part of the Statutory Development Plan.

48 The Greater London Authority have published London Plan Guidance (“LPG”) and Supplementary Planning Guidance (“SPG”) which provide further information about how the London Plan should be implemented. Those of relevance include:

- Design: process and tools (October 2019)

- Historic environment (July 2019)

- Housing: optional technical standards (March 2015)
- Town centres and retail (September 2020)

LOCAL PLANNING POLICY

49 The Richmond Local Plan (July 2018) outlines the policies and guidance for development within the Borough until 2033, identifying where the main developments will take place, how places within the Borough will change or be protected from change.

410 LB Richmond is in the process of drafting a new Local Plan. The timetable indicates that first engagement occurred with residents, stakeholders and businesses with regard to the new Local Plan between March – April 2020. Following this, informal engagement and reflection on feedback was undertaken Summer/Autumn 2021. Public consultation on the Draft Local Plan (Reg 18) was undertaken between December 2021 – January 2022. Between 9 June – 24 July 2023 a revised Draft Local Plan was created with a third public consultation occurring in respect of this (Reg 19). At present, the Draft Local Plan along with all the feedback received during consultation has been submitted to the Secretary of State. The new Local Plan is likely to be adopted Winter 2024/25.

411 Regarding decision making, noting that the New Local Plan is at Reg 19 stage and has been submitted to the secretary of State, some weight should be afforded to the Draft Local Plan although we understand this has not yet been adopted.

OTHER MATERIAL CONSIDERATIONS

412 Other material considerations in the determination of the application include the Inspector's appeal decision, which can be afforded significant weight as well as other local guidance which includes:

- Teddington High Street Conservation Area Appraisal
- Affordable Housing SPG
- Buildings of Townscape Merit SPG
- Design Quality SPG
- Refuse and Recycling Storage Requirements SPG
- Residential Standards SPG
- Small and Medium Housing Sites SPG

5.0 PLANNING POLICY (AND MATERIAL CONSIDERATIONS - NPPF)

- 5.1 Within this Section, the key planning considerations and relevant planning policy is set out, with an assessment of the Proposed Development against the Statutory Development Plan and other material considerations outlined in **Section 6.0**.
- 5.2 For the LPA to come to a decision, consideration of the prevailing development plan and determination in accordance with that plan, unless material considerations indicate otherwise, is required. This exercise involves the evaluation of the compliance or otherwise of the application with policies, by reference to relevant policy and thereafter to identify whether, on balance, the proposals are acceptable.

PLANNING CONSIDERATIONS (POLICY MATTERS)

- 5.3 The key planning considerations assessed include:
- Principle of Development;
 - Affordable Housing;
 - Design and Materiality;
 - Basements;
 - Mix and Quality of Proposed Living Accommodation;
 - Heritage and Townscape;
 - Archaeology;
 - Biodiversity and Trees;
 - Energy and Sustainability;
 - Amenity;
 - Flooding;
 - Servicing, Waste and Refuse;
 - Transport.

PRINCIPLE OF DEVELOPMENT

- 5.4 **Policy H1** of the London Plan supports housing delivery, particularly on brownfield sites, as does **Policy LP34** (New Housing) of the Local Plan, which specifically identifies approximately 650-700 units in and around the Teddington area.
- 5.5 **Policy E9** (Retail Markets and hot food takeaways) of the London Plan support new commercial space at ground floor level in designated centres. **Policy LP25** of the Local Plan also supports new commercial floorspace in designated centres, together with additional residential accommodation.
- 5.6 For the reasons set out within **Section 6.0**, the proposed land uses and their intensification on the site are in accordance with the key policies contained in the development plan and represents sustainable development.

AFFORDABLE HOUSING

- 5.7 **Policy H4 (Delivering affordable housing)** of the London Plan outlines that the strategic target is for 50% of all new homes delivered across London to be genuinely affordable.
- 5.8 **Policy LP6 (Affordable Housing)** of the Local Plan echoes the London Plan, seeking to deliver 50% of all housing to be affordable. A contribution towards affordable housing is expected on all sites. On sites below the threshold of 'capable of ten or more units gross', a financial contribution to the Affordable Housing Fund commensurate with the scale of development.
- 5.9 **Policy 11 (Affordable Housing)** of the Draft Plan requires all new housing developments in the borough should provide at least 50 per cent of the total number of habitable rooms as affordable housing on site.

DESIGN AND MATERIALITY

- 5.10 **Policy D3 (Optimising site capacity through the design-led approach)** of the London Plan seeks to ensure that all development makes the best use of land, optimising the capacity of sites, requiring consideration of design options. Development should positively respond to local distinctiveness and character, whilst providing safe, secure and inclusive environments. Optimisation is established typically through options (and the site has been subject of many).
- 5.11 **Policy D4 (Delivering good design)** of the London Plan emphasises the importance of maintaining design quality of development proposals through to completion and where appropriate for proposals to be subject to design scrutiny. That scrutiny has been provided by the professional officers of the Council.
- 5.12 **Policy LP1 (Local Character and Design Quality)** of the Local Plan requires all development to be of high architectural and urban design quality. Development proposals will have to demonstrate an understanding of the site and how it relates to its existing context, including character and appearance. Where appropriate, opportunities should be taken to improve the general level of design of an area.
- 5.13 LB Richmond have set out the following considerations when assessing proposals:
- compatibility with local character including the relationship to existing townscape, development patterns, views, local grain and frontages as well as scale, height, massing, density, landscaping, proportions, form, materials and detailing;
 - sustainable design and construction, including adaptability, subject to aesthetic considerations;
 - layout, siting and access, including making best use of land;
 - space between buildings, relationship of heights to widths and relationship to the public realm, heritage assets and natural features;
 - inclusive design, connectivity, permeability (as such gated developments will not be permitted), natural surveillance and orientation; and
 - suitability and compatibility of uses, taking account of any potential adverse impacts of the collocation of uses through the layout, design and management of the site.
- 5.14 For shopfronts, under **Policy LP1**, the proposals should complement the character, materials and details of the surrounding street scene. The Council will resist the removal of shopfronts of architectural or historic interest.
- 5.15 **Policy LP2 (Building Heights)** of the Local Plan requires new buildings to make a positive contribution towards the local context, townscape and heritage assets. Proposals that are taller than surrounding townscape will need to demonstrate high design quality and public realm benefits. Policy LP2 sets out appropriate areas for enhancement that can be through scale, height, mass, urban pattern, development grain, materials, streetscape, roofscape, wider townscape and landscape.
- 5.16 **Policy 28 (Local Character and Design Quality)** of the Draft Local Plan policy emphasises the importance of development being of a high architectural and urban design quality.
- 5.17 **Policy 44 (Design Process)** of the Draft Local Plan, echoes **Policy D3** of the London Plan by advocating optimising site capacity through the design-led approach.

MIX AND QUALITY OF ACCOMODATION

- 5.18 **Policy D3 (Optimising site capacity through the design-led approach)** of the London Plan seeks to deliver appropriate outlook, privacy and amenity. **Policy D6 (Housing quality and standards)** of the London Plan seeks to ensure that development is of a high quality, providing adequately sized rooms with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners. Development should be dual aspect, providing sufficient daylight, sunlight whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.
- 5.19 **Policy H10 (Housing size mix)** of the London Plan indicates that schemes should generally consist of a range of unit sizes.
- 5.20 **Policy LP 8 (Amenity and Living Conditions)** of the Local Plan seeks to ensure the design and layout of buildings enables good standards of daylight and sunlight to be achieved for future occupiers and neighbouring occupiers, in addition to ensuring adequate levels of privacy and no adverse impacts in terms of overbearing, sense of enclosure,

increases in traffic, servicing, parking, noise, light, disturbance, air pollution, odours or vibration or local micro-climatic effects.

- 5.21 **Policy LP 35 (Housing Mix and Standards)** of the Local Plan outlines that a higher proportion of small units are appropriate in Main Centres and that the dwelling mix should be appropriate to the site-specifics of the location.
- 5.22 **Policy 13 (Housing Mix and Standards)** of the Draft Local Plan indicates that development should generally provide a mix of sizes and types of accommodation. Areas with higher PTAL ratings (3-6) or within 800m distance of a station or town centre boundary should provide a higher proportion of small units (studios and 1 beds). For market housing, there is highest demand for 2 and 3 beds.
- 5.23 **Policy 46 (Amenity and Living Conditions)** of the Draft Local Plan indicates that all development will be required to protect the amenity and living conditions for occupants of new, existing, adjoining, and neighbouring properties and the visual amenity of the area as a whole.

BASEMENTS

- 5.24 **Policy D10 (Basement Development)** of the London Plan seeks to ensure that basement development proposals do not have a negative impact on existing buildings, where this is identified as an issue locally. The Proposed Development includes the provision of a basement for the commercial unit.
- 5.25 **Policy LP11 (Subterranean Developments and Basements)** of the Local Plan sets out the following criteria for all new subterranean and basement development proposals:
- extend to no more than a maximum of 50% of the existing garden land or more than half of any other undeveloped garden area (this excludes the footprint of the original building);
 - demonstrate the scheme safeguards the structural stability of the existing building, neighbouring buildings and other infrastructure, including related to the highway and transport; a Structural Impact Assessment will be required where a subterranean development or basement is added to, or adjacent to, a listed building.
 - use natural ventilation and lighting where habitable accommodation is provided;
 - include a minimum of 1 metre of naturally draining permeable soil above any part of the basement beneath the garden area, together with a minimum 200mm drainage layer, and provide a satisfactory landscaping scheme;
 - demonstrate that the scheme will not increase or otherwise exacerbate flood risk on the site or beyond, in line with policy LP 21 Flood Risk and Sustainable Drainage;
 - demonstrate as part of a Construction Management Statement that the development will be designed and constructed to minimise the impact during construction and occupation stages (in line with the Local Environmental Impacts, Pollution and Land Contamination policy of this Plan).
- 5.26 **Policy 54 (Basements and Subterranean Developments)** of the Draft Local Plan sets out the following criteria for development proposals involving basements:
- extend to no more than a maximum of 50% of the existing garden land or more than half of any other undeveloped garden area (this excludes the footprint of the original building);
 - demonstrate the scheme safeguards the structural stability of the existing building, neighbouring buildings and other infrastructure, including related to the highway and transport; a Structural Impact Assessment will be required where a subterranean development or basement is added to, or adjacent to, a listed building.
 - use natural ventilation and lighting where habitable accommodation is provided to ensure the health and well-being of its occupants;
 - include a minimum of 1 metre naturally draining permeable soil above any part of the basement beneath the garden area, together with a minimum 200mm drainage layer, and provide a satisfactory landscaping scheme;
 - demonstrate that the scheme will not increase or otherwise exacerbate flood risk on the site or beyond, in line with Policy 8 'Flood Risk and Sustainable Drainage (Strategic Policy)'; a site specific Screening Assessment, undertaken by a chartered professional, is required to assess likely impacts from subterranean development within throughflow and groundwater policy zones and/or in an area with $\geq 25\%$ susceptibility to groundwater flooding; if the Screening Assessment determines that the proposed subsurface development may have an impact on the local environment, or if it determines that further investigation work is required, then a Basement Impact Assessment is required;
 - where the proposal contains a waste outlet, install a suitable (positively) pumped device to protect the development from sewer flooding, in line with Policy 8 'Flood Risk and Sustainable Drainage (Strategic Policy)'
 - demonstrate as part of a Construction Management Plan that the development will be designed and constructed so as to minimise the impact during construction and occupation stages (in line with Policy 53 'Local Environmental Impacts');

- demonstrate that the proposal does not cause loss, damage or adverse impact to biodiversity, including trees, and amenity value; and
- externally visible elements such as light wells, roof lights and fire escapes need to be sensitively designed and sited to avoid any harmful visual impact on neighbouring properties or visual amenity.

HERITAGE AND TOWNSCAPE

- 5.27 **Policy HC1 (Heritage conservation and growth)** of the London Plan outlines that development proposals affecting heritage assets and their settings, should conserve their significance by being sympathetic to the assets' significance and appreciation within the site context.
- 5.28 **Policy LP3 (Designated Heritage Assets)** of the Local Plan sets out all development will need to conserve, and where possible make a positive contribution to the historic environment. Development proposals likely to adversely affect the significance of heritage assets (including setting) will be assessed against the requirement to seek to avoid harm and the justification for the proposal.
- 5.29 For development proposals in conservation areas, particular attention is placed on the requirement to preserve and, where possible, enhance the character or the appearance of the conservation area.
- 5.30 LB Richmond will resist substantial demolition in conservation areas unless:
- in the case of substantial harm or loss to the significance of the heritage asset, it is necessary to achieve substantial public benefits that outweigh that harm or loss;
 - in the case of less than substantial harm to the significance of the heritage asset, that the public benefits, including securing the optimum viable use, outweigh that harm; or
 - the building or part of the building or structure makes no positive contribution to the character or distinctiveness of the area.
- 5.31 **Policy LP4 (Non-Designated Heritage Assets)** seeks to preserve, and where possible enhance, the significance, character and setting of non-designated heritage assets, including BTM.
- 5.32 **Policy 29 (Designated Heritage Assets)** of the Draft Local Plan requires development to conserve and, where possible, take opportunities to make a contribution to the historic environment of the borough.
- 5.33 **Policy 30 (Non-designated Heritage Assets)** of the Draft Local Plan seeks to preserve, and where possible enhance, the significance, character and setting of non-designated heritage assets, including Buildings of Townscape Merit, memorials, particularly war memorials, locally listed historic parks and gardens and other local historic features.

ARCHAEOLOGY

- 5.34 **Policy HC1 (Heritage conservation and growth)** of the London Plan indicates that development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes.
- 5.35 **Policy LP7 (Archaeology)** of the Local Plan states that archaeological heritage (above and below ground) will need to be protected, enhanced and promoted, and will encourage its interpretation and presentation to the public.
- 5.36 **Policy 33 (Archaeology)** of the Draft Local Plan seeks to protect, enhance and promote its archaeological heritage and will encourage its interpretation and presentation to the public. It will take the necessary measures required to safeguard the archaeological remains found and refuse planning permission where proposals would adversely affect archaeological remains or their setting. Desk based assessments, and where necessary, archaeological field evaluation will be required where development is proposed on sites of archaeological significance.

BIODIVERSITY AND TREES

- 5.37 **Policy G1 (Green Infrastructure)** of the London Plan outlines proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network. **Policy G5 (Urban Greening)** of the London Plan which outlines suitable measures include landscaping, green roofs, green walls and sustainable drainage solutions.

- 5.38 **Policy G6 (Biodiversity and access to nature)** of the London Plan outlines that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain.
- 5.39 **Policy LP15 (Biodiversity)** of the Local Plan, echoes Policy G6 of the Local Plan, seeking to protect and enhance the borough's biodiversity.
- 5.40 **Policy LP16 (Trees, Woodlands and Landscape)** of the Local Plan requires the protection of existing trees and the provision of new trees, shrubs and other vegetation of landscape significance that complement existing, or create new, high quality green areas, which deliver amenity and biodiversity benefits.
- 5.41 **Policy 39 (Biodiversity and Geodiversity)** of the Draft Local Plan seeks to protect and enhance the Borough's biodiversity and geodiversity. **Policy 42 (Trees, Woodland and Landscape)** requires the protection of existing trees and the provision of new trees.

ENERGY AND SUSTAINABILITY

- 5.42 **Policy S12 (Minimising greenhouse gas emissions)** of the London Plan sets out a minimum on-site reduction in respect of greenhouse gas emissions.
- 5.43 **Policy LP20 (Climate Change Adaptation)** of the Local Plan supports development that is resilient to climate change. This includes minimising the effects of overheating and energy consumption through the following cooling hierarchy:
- minimise internal heat generation through energy efficient design
 - reduce the amount of heat entering a building in summer through shading, reducing solar reflectance, fenestration, insulation and green roofs and walls
 - manage the heat within the building through exposed internal thermal mass and high ceilings
 - passive ventilation
 - mechanical ventilation
 - active cooling systems (ensuring they are the lowest carbon options).

AMENITY

- 5.44 **Policy D3 (Optimising site capacity through the design-led approach)** of the London Plan seeks to deliver appropriate outlook, privacy and amenity. **Policy D6 (Housing quality and standards)** of the London Plan seeks to ensure that development is of a high quality, providing adequately-sized rooms with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners. Development should be dual aspect, providing sufficient daylight, sunlight whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.
- 5.45 **Policy D13 (Agent of Change) of the London Plan** emphasises the importance of development being designed to ensure that established noise and other nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them and that good design mitigates and minimises existing and potential nuisances generated by existing uses and activities located in the area.
- 5.46 **Policy LP 8 (Amenity and Living Conditions)** of the Local Plan seeks to ensure the design and layout of buildings enables good standards of daylight and sunlight to be achieved for future occupiers and neighbouring occupiers, in addition to ensuring adequate levels of privacy and no adverse impacts in terms of overbearing, sense of enclosure, increases in traffic, servicing, parking, noise, light, disturbance, air pollution, odours or vibration or local micro-climatic effects.
- 5.47 **Policy 46 (Amenity and Living Conditions)** of the Draft Local Plan indicates that all development will be required to protect the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties and the visual amenity of the area as a whole.

FLOODING

- 5.48 The Site is located in Flood Zone 1 (the lowest risk of flooding) and in a Critical Drainage Area.
- 5.49 **Policy SI 12 (Flood Risk Management)** of the London Plan seeks to ensure that development proposals minimise and mitigate flood risk, to ensure that residual risk is addressed.
- 5.50 **Policy LP21 (Flood Risk and Sustainable Drainage)** of the Local Plan requires all development to avoid or minimise contributing to all sources of flooding.

- 5.51 **Policy LP22 (Sustainable Design and Construction)** of the Local Plan requires developments to achieve the highest standards of sustainable design and construction to mitigate the likely effects of climate change.

SERVICING, WASTE AND REFUSE

- 5.52 **Policy SI 7 (Reducing waste and supporting the circular economy)** of the London Plan seeks to ensure that developments are designed with adequate, flexible, and easily accessible storage space and collection systems that support, as a minimum, the separate collection of dry recyclables (at least card, paper, mixed plastics, metals, glass) and food.
- 5.53 **Policy LP24 (Waste Management)** of the Local Plan sets out that development will need to follow the waste hierarchy to reduce, reuse and recycle waste as close as possible to where it is produced. This includes the provision of adequate refuse and recycling storage space and facilities, that is sensitively integrated within the overall design of the scheme.
- 5.54 **Policy 7 (Waste and the Circular Economy)** of the Draft Local Plan seeks to ensure waste is managed in accordance with the principles of the Circular economy.

TRANSPORT

- 5.55 **Policy T1 (Strategic approach to transport)** of the London Plan indicates that development proposals should facilitate the delivery of the Mayor's strategic target of 80% of all trips made by foot, cycle or public transport and that all development should make the most effective use of land.
- 5.56 **Policy T4 (Assessing and mitigating transport impacts)** of the London Plan outlines that development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity. When required, transport assessments should be submitted to ensure the impact on the capacity of the transport network are fully assessed.
- 5.57 **Policy T5 (Cycling)** of the London Plan emphasises the importance of helping to remove barriers to cycling and create a healthy environment in which people choose to cycle. Table 10.2 outlines the minimum cycle parking standards.
- 5.58 **Policy T6 (Car parking)** of the London Plan seeks to restrict car parking in line with levels of existing and future public transport accessibility and connectivity. 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. **Policy T6.1 (Residential parking)** of the London Plan indicates that new residential development should not exceed the maximum parking standards set out within Table 10.3 of the London Plan.
- 5.59 **Policy LP 44 (Sustainable Travel Choices)** of the Local Plan outlines that the Council aims to minimise the impacts of development including in relation to congestion, air pollution and carbon dioxide emissions, and maximise opportunities including for health benefits and providing access to services, facilities and employment. **Policy LP 45 (Parking Standards and Servicing)** of the Local Plan outlines that car free housing developments may be appropriate in areas with higher public transport accessibility levels. The Council will require new development to make provision for the accommodation of vehicles in order to provide for the needs of the development while minimising the impact of car-based travel.
- 5.60 **Policy 47 (Sustainable Travel Choices)** of the Draft Local Plan seeks to bring about safe, sustainable, accessible transport solutions to reduce the proportion of trips taken by private car, reduce traffic congestion, reduce air pollution, including carbon dioxide emissions, improve public health, and improve access to services and employment.
- 5.61 **Policy 48 (Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management)** of the Draft Local Plan requires new developments to make provision for the accommodation of vehicles to provide for the needs of the development while minimising the impact of car-based travel including on the operation of the road network and local environment and ensuring making the best use of land. This policy outlines that cycle parking provision should be in line with the London Plan. Car-free development is most appropriate in areas with high public transport accessibility areas.

FIRE

- 5.62 London Plan **Policy D12 (Fire Safety)** seeks to ensure that the fire strategy for development proposals is considered at the outset. For non-major development proposals, the policy states that applications should:

"1) identify suitably positioned unobstructed outside space:

- a) for fire appliances to be positioned on*
- b) appropriate for use as an evacuation assembly point*

2) are designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire; including appropriate fire alarm systems and passive and active fire safety measures.

3) are constructed in an appropriate way to minimise the risk of fire spread

4) provide suitable and convenient means of escape, and associated evacuation strategy for all building users

5) develop a robust strategy for evacuation which can be periodically updated and published, and which all building users can have confidence in

6) provide suitable access and equipment for firefighting which is appropriate for the size and use of the development.

6.0 ASSESSMENT

- 6.1 This Section of the Statement provides an assessment of the proposed scheme, as required by section 38(6) of the 2004 Act against adopted and emerging planning policies.
- 6.2 The Statement provides a detailed assessment of the proposals for the redevelopment of the Site in relation to national, strategic and local planning policy and other material considerations. As indicated below the Proposed Development is consistent with the statutory development plan.
- 6.3 For the avoidance of doubt, the Proposed Development will deliver a number of benefits. These are summarised below:
- Boosts the supply of housing within the Borough by seven new dwellings and one replacement dwelling;
 - Presents a high-quality design which responds well to the local context and positively impacts Teddington Conservation Area;
 - Provides high-quality residential accommodation in a sustainable location, and;
 - Introduces active frontages at ground floor serving good quality commercial space, in a designated District Centre location.

PRINCIPLE OF DEVELOPMENT

- 6.4 Teddington is designated as a Main Centre within Richmond's Local Plan and as a District Centre in the London Plan. As recognised in the London Plan, London's town centre network is central to the lives of Londoners. Local, regional and national planning policy promotes the diversification and densification of town centres to make the best use of the land. Diverse range of uses accommodated in a well-designed development will enhance the vitality and viability of town centres.
- 6.5 The key principle at the heart of the NPPF is the presumption in favour of sustainable development (paragraph 10). Paragraph 124 (d) of the NPPF (2023) states that planning decisions should:
- "promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively"*
- 6.6 Richmond's spatial strategy set out in the Local Plan, outlines that higher density development should be concentrated in the borough's five main centres. Local, regional and national planning policy promotes the effective use of previously developed land to facilitate the delivery of much needed new homes.
- 6.7 The Site is a brownfield site comprising a vacant two storey building on Teddington High Street, approximately a 6-minute walk from Teddington Station. The Scheme will redevelop this underutilised Site, providing mixed-use development through the combination of commercial floorspace at ground and basement floors, with residential units over the upper floors.
- 6.8 The Proposed Development would introduce active frontages at ground floor which will enhance the vitality and functioning of the Teddington High Street.
- 6.9 The Scheme introduces eight space-standard compliant residential units over the upper floors, in a highly accessible location. Within the appeal decision, the Inspector supports the principle of the development, outlining that the *'proposed mix of uses would be of an appropriate character and would have the benefit of providing an active frontage at ground floor'* (Paragraph 9).
- 6.10 The principle of the development aligns with the policy aspirations outlined within Section 6.0 and was supported previously in both the 2019 and 2021 applications.

AFFORDABLE HOUSING

- 6.11 Policy LP36 requires a Viability Assessment if affordable housing contributions cannot be provided in line with the requirements set out in this policy.

- 6.12 The submitted Viability Statement prepared by Douglas Birt Consulting concludes that the Proposed Development is unable to provide an affordable housing contribution viably. This position was previously agreed in both the 2019 and 2021 permissions, with the Inspector outlining that *‘the appellant has demonstrated to the satisfaction of the Council that the schemes would not be sufficiently viable to sustain affordable housing’* (Paragraph 38).

DESIGN

- 6.13 The Heritage Assessment provides a robust review of the surrounding heritage considerations in respect of the Site, the Proposed Development and local context.
- 6.14 There is no dispute over the architectural quality and general condition of the existing building, which detracts from the setting of the Conservation Area and adjoining BTM. The Inspector indicates that *‘the premises appear somewhat run down and the forecourt has been described as unattractive and in need of improvement. I agree it does not have a positive appearance in the street scene’* (Paragraph 11). The principle of demolition and replacement with a building of a better architectural quality is therefore acceptable, subject to meeting local policies with respect to design.
- 6.15 The Proposed Development has positively evolved through an understanding of the Site, surrounding context, aspirations of the Development Plan, comments from the Inspector, pre-application meetings with LB Richmond and local neighbourhood consultation. Further details on design are outlined below.

SCALE AND MASSING

- 6.16 Local policies seek to ensure that development proposals respond to surrounding context, whilst also ensuring that all proposals preserve, and where possible enhance the character and appearance of conservation areas.
- 6.17 The Proposed Development increases the height and massing of the building on Site. As indicated, the Site occupies a corner plot location which offers the opportunity to increase the height noting examples of similar relationships within the wider streetscene at 110 High Street and 160 High Street. The Inspector indicates *‘there is no objection in principle to a higher focal point on this corner plot as is found elsewhere in the area’* (Paragraph 40).
- 6.18 The revised Scheme comprises a single building made up of two elements. The lower block, which is situated to the South of the Site, matches the residential terraces on Cedar Road. The larger block provides a continuation of the High Street scale and design, forming the corner and marking the transition at the end of the terrace. The height of the Proposed Development has been sensitively designed to respond to the Site context. The height of the proposed building aligns with the BTM on the north elevation and with the Cedar Road terrace at the southern end of the Site. The attic storey takes a mansard form and has been recessed, so that it is subservient to the host building. Consequently, from most vantage points the mansard roof does not read as part of the street scene, reducing the impression of the building’s overall height to that of three storeys, which is consistent with this part of the High Street.
- 6.19 Whilst the increase in massing creates a slight prominence in comparison to the existing building, the development has been designed appropriately to assimilate effectively within the site context, aligning with adopted and emerging policies.

MATERIALITY AND APPEARANCE

- 6.20 The Proposed Development has a modern character and appearance which is, however, informed by the historic context of the site, and as explained in the Design and Access Statement.
- 6.21 The High Street facing building appears as two elements, relieved by pilasters above the shop columns; here are horizontal bands of taller windows arranged in groups of three. At first floor, the Proposed Development incorporates projecting bay windows which reflect the western terrace and BTM. Again, reflecting the surrounding historic context, there is a string course continuing a datum found on the BTM detail, adjoining. The orderly façade organisation is consistent with the regular arrangement of the historic elevations in the conservation area.
- 6.22 At ground floor level, the Scheme introduces fully glazed ground floor active frontages on the High Street and Cedar Road which enhance commercial exposure and vibrancy within this district centre location. Stall risers are indicated.

- 6.23 High Street element of the scheme is to be a dark red multi brick, with the Cedar Road element to be a lighter, 'weathered' yellow hued brick picking up the stock bricks in the Edwardian terrace to the south. The copings, lintels and piers are in precast material, tinted to reflect the colour of the brick facing. The use of high-quality materials and design, drawing from local context and reflecting the high street building line, would be a significant improvement in comparison to the existing building which is a marked departure from the grain and character of the conservation area.
- 6.24 The lower block incorporates design features to ensure this element of the Scheme assimilates effectively within the residential context of Cedar Road, incorporating paired windows, two-storey bay windows with gable heads to reflect the Edwardian terrace. The taller block is served by a mansard roof form, which is set back from the pub gable-end wall to ensure an acceptable impact on the adjoining BTM.
- 6.25 As demonstrated in the DAS, and explained in the heritage statement, the scheme has evolved considerably over five years, departing from a modern design (which had been supported by officers) to one which draws obviously on contextual sources, and the result is, in our judgment, sympathetic and well-designed proposal which responds to the local context, enhancing the character and appearance of the conservation area and the streetscene more generally. The Proposed Development therefore complies with the relevant policies adopted and emerging policies as outlined above. We say this having full regard to the Inspector's decision and the detailed comments made with respect to the previous design. A full analysis of the proposal against the decision is included in section 7.0 of this statement.

BASEMENT

- 6.26 The proposal introduces a single storey basement for use in connection with the ground floor Class E use. In accordance with Policy LP 11, a Construction Management Statement, Basement Impact Assessment and Land Contamination Assessment has been submitted with this application.
- 6.27 Notwithstanding that structural matters are controlled by the Building Regulations; the supporting documents demonstrate that the proposed basement will not have an impact on the structural stability of neighbouring properties. The Basement Impact Assessment also confirms that the proposal will not increase flood risk on site or beyond.
- 6.28 The Proposed Development therefore complies with the relevant statutory and emerging policies as set out above in respect of the basement.

MIX AND QUALITY OF PROPOSED LIVING ACCOMODATION

- 6.29 The Proposed Development comprises 6 x 1 bed units and 2 x 2 bed units. As indicated above, Local Plan Policy seeks a higher proportion of smaller units within the main centres of Richmond. The previous 2019 and 2021 applications confirm the acceptability of this dwelling mix and there is no material change in policy since the appeal decision, which also concluded the mix to be acceptable.
- 6.30 The proposed residential units all meet the prescribed space standards. As well as minimum unit sizes, the Mayor's Housing SPG sets out a number of internal design standards which should be met in order to deliver high quality development. The proposed accommodation complies with these standards with regards to internal circulation, floor-to-ceiling heights, dual-aspect rooms and accessibility.
- 6.31 The Scheme requires 44sqm of private amenity space (in line with the Mayor's Housing SPG). The Proposed Development benefits from 46.2sqm of amenity space in the form of balconies and roof terraces, therefore exceeding the minimum requirement.

ACCESSIBILITY

- 6.32 100% of the residential dwellings would meet Part M4(2) Accessible & Adaptable Standards, with 75% meeting Part M4(3) Wheelchair User Dwellings.

AMENITY

- 6.33 With regard to amenity considerations in respect of the neighbouring and future occupiers of the Site, the Proposed Development would ensure adequate levels of daylight, sunlight and outlook, whilst also retaining sufficient privacy. Further detail is outlined below.

OVERLOOKING

- 6.34 The east elevation overlooks a public car park and as such there is no direct overlooking to habitable rooms from this space.
- 6.35 The High Street elevation maintains the existing and established separation distance at ground floor level between the southern and northern sides of the High Street. Over the upper levels a separation distance of approximately 24m is maintained between the Site and the nearest residential properties on the northern side of the High Street and Vicarage Road.
- 6.36 To the rear, an access road separates the Proposed Development and No.2 Cedar Road. The shared boundary between this neighbouring property and the Site comprises a large, deep flank wall and tall garden wall which extends the full depth of the plot.
- 6.37 The neighbouring property at No.2 Cedar Road, has one first floor window adjacent to the Site. The policy text in respect of LP 8 indicates that the test of overlooking and privacy relates to the impact on habitable rooms. The window within the flank elevation of No.2 Cedar Road is obscure glazed, serving a non-habitable bathroom and therefore adverse overlooking impacts would not arise.
- 6.38 The property at 14 Christchurch Avenue is in excess of 20m away to the southwest, such that it will retain a good outlook, light and privacy and avoid any overshadowing.

DAYLIGHT AND SUNLIGHT

- 6.39 In support of the development, a daylight and sunlight assessment has been undertaken demonstrating that the new development would have an acceptable impact on the neighbouring buildings.
- 6.40 The assessment also outlines that the habitable rooms within the proposed Scheme would receive good levels of daylight and sunlight. The Proposed Development would therefore accord with the relevant policies as outlined above.

NOISE

- 6.41 A Noise Impact and Construction Noise Management Assessment have been prepared by Clement Acoustics in respect of the Proposed Development.
- 6.42 The Noise Impact report sets out the existing background noise levels. The measured noise levels have been utilised to determine the noise emissions criteria for the proposed plant installation in line with the requirements of the LBRuT. The report sets out the results of the environmental survey, followed by noise impact calculations and outlines mitigation measures.
- 6.43 The report recommends that ventilation to the plant room is via acoustic rated louvres only. The louvres should provide sufficient attenuation to achieve a maximum sound pressure level of 44 dB(A) when measured at 1m externally. The report concludes that the noise emissions associated with the Proposed Development would meet the requirements of the LBRuT, with the aforementioned mitigation measures.
- 6.44 In terms of the Construction Management Assessment, the report sets out the noise criteria and recommended limits for noisy works associated with the Proposed Development and provides a management plan to mitigate any identified impact.
- 6.45 In line with the above assessment and identified mitigation measures, the Proposed Development would ensure an acceptable impact on the amenity of neighbouring occupiers in terms of noise and disturbance.

PARKING AND SERVICING

- 6.46 In support of this application, a Transport Statement has been prepared. The Transport Statement discusses the accessibility of the Site by sustainable transport modes, considers parking provisions and servicing requirements in respect of the commercial use. Trip generation for the Proposed Development is estimated, with the potential effects on the surrounding highway and public transport network.

CAR PARKING

- 6.47 The Site resides within a Controlled Parking Zone (CPZ) and has a PTAL rating of 3 (good). Noting the London Plan objectives and accessible location, car parking is therefore not proposed as part of the Scheme.
- 6.48 In order to mitigate the impact of increased car parking pressure on the surrounding area, the Applicant proposes a condition to ensure the occupiers of the future development are unable to obtain car parking permits.

CYCLE PARKING

- 6.49 The NPPF, London Plan and Local Plan seek to promote sustainable transport modes, by having minimum standards set out within the London Plan.
- 6.50 In respect of the residential units, 11 secure cycle parking spaces are provided at ground floor, with access obtained from Cedar Road. Given the limited site area available, the applicant proposes to install 8 cycle parking spaces on the public highway for the commercial unit, the location of which is indicated in the Design and Access Statement.
- 6.51 Sufficient cycle parking is provided for the commercial and residential units proposed on site. Details of on-street cycle parking including types of stands and layouts are to be secured by condition.

SERVICING

- 6.52 Separate refuse storage areas for the commercial and residential uses are situated to the rear of the Site. Refuse will be collected on-street via Cedar Road as per the existing arrangements.
- 6.53 In summary, the car-free nature of the scheme aligns with adopted and emerging policy objectives, with the proposal incorporating sufficient cycle parking, waste storage and providing appropriate arrangements for delivery and servicing.

SUSTAINABILITY AND ENERGY

- 6.54 As indicated in **Section 5.0**, policy seeks to ensure buildings are designed to improve energy efficiency. In support of this application, an Energy Statement has been commissioned which outlines the baseline energy requirements, the reduction in energy demand as a result of energy efficiency measures and the potential to achieve further carbon dioxide reductions using renewable energy technologies.
- 6.55 The Statement indicates that opportunities to connect the Proposed Development to the existing decentralised heat distribution networks have been explored with reference to the London Heat Map. Following investigation, there are no networks within 500m of the Site and as such it is unfeasible for the Site to cater for a connection for decentralised future district heating network. Passive strategies have been implemented to reduce the risk of overheating.
- 6.56 Fabric improvements & energy efficiency measures in the 'be lean' stage, resulted in reducing the carbon emissions of the site by 45% compared to the Part L 2021 notional baseline. Employing an ASHP for heating and hot water along with 11kWp of PV panels reduce CO2 emissions by a further 23% within the site. The development overall reduction is 68% saving 6.1 Tonnes of CO2, meeting policy requirements.
- 6.57 On the sustainability checklist, the Scheme would achieve a total score of 57 points resulting in a rating of B and therefore helping to significantly improve the Borough's stock of sustainable developments in respect of residential new build. In line with the above, the application has adequately demonstrated that the proposal can meet the sustainability requirements.

FLOODING

- 6.58 The Site is located in Flood Zone 1, with a low risk of flooding. The existing site is entirely comprised of hard surfacing and the proposal does not increase the amount of surfacing on site.
- 6.59 In support of this application, a Flood Risk Assessment (FRA) has been submitted (within the Basement Impact Assessment Report) which concludes that the Site has a low to very low risk of surface water flooding.
- 6.60 The FRA outlines recommended Sustainable Drainage Systems (SuDS). As indicated, the existing Site is paved over, there is the potential to use permeable paving in external areas at ground level to mitigate potential small loss of infiltration through the introduction of a basement. The risk from sewer flooding is deemed low in the FRA.
- 6.61 The Proposed Development accords with the development plan in respect of flood risk. Further, this position was confirmed in both the 2019 and 2021 applications.

ARCHAEOLOGY

- 6.62 The Site resides within an Archaeological Priority Area. As such, an Archaeological Statement has been submitted with this application in accordance with Policy LP 7.
- 6.63 The statement outlines that there is no recorded evidence of archaeology on the site beyond the current building (HSBC Bank circa 1962) and one former building (possibly a confectioners built between 1908 – 12). Therefore, the site holds a low archaeological significance.
- 6.64 As the site is within an Archaeological Priority Area, if deemed appropriate, further investigation could be controlled by a suitably worded planning condition, requiring a watching brief to monitor development groundworks and to record any archaeological evidence revealed.

ARBORICULTURE

- 6.65 An arboriculture report has been prepared by Sylvan Resources Limited, which includes a tree survey, impact assessment and methodology.
- 6.66 The report notes that there is a street tree in proximity to the site on Cedar Road, the Root Protection Area of which extends into the site boundary by 1.2m. The report sets out that the tree will be hoarded and pruned prior to works commencing to protect it during the construction process.
- 6.67 The report also considers the approach to root protection area within the site, in terms of protection and excavation. If upon investigations tree roots are found to be within the application site, the report notes that the design of the foundations will be adapted to be constructed off a beam framework resting on its basement walls and piles inserted into the ground outside the Root Protection Area boundary.

FIRE

- 6.68 A fire statement has been prepared in support of the application by GM Fire Limited. The document identifies that there is sufficient on-street space available for fire tenders to access the property and that a safe evacuation point exists in the form of the surface car park directly opposite the site.
- 6.69 The report also notes that the flats and commercial units will have mains powered interlinked fire alarms.
- 6.70 With respect to the construction, 60 min fire resistant walls and floors between individual demises will be provided to minimise the spread of fire. Internally, 20-30 min fire resistance construction will be used.
- 6.71 Evacuation and escape from the upper floors will be via a protected lobby and stairwell to ground.

ECOLOGY

6.72 A preliminary roost assessment has been prepared by Arbtech and accompanies the application. This concludes that there are no bats present on site.

7.0 APPEAL

7.1 The appeal decision is a material consideration in the determination of the Proposed Development. The following section outlines the pertinent issues the Inspector considered within the appeal decision, how the current scheme responds to the points raised and how the Inspector's comments have been incorporated into the design of the Proposed Development.

7.2 The current proposals were formulated with reference to the very clear directions which the Inspector gave in her appeal decision letter. This is demonstrated in the DAS. We summarise those points here.

EXISTING BUILDING

7.3 There has been no dispute over the design quality of the existing building and its impact on the surrounding context. The Inspector confirms within the appeal decision that the building does not have a *“positive effect on the character and appearance”* of the Teddington Conservation Area (Paragraph 31) and therefore no objection is made in respect of its demolition.

TEDDINGTON HIGH STREET

7.4 The Inspector draws attention to the predominant characteristics of the High Street terrace, indicating that:

“Both No. 6 [former Natwest corner building] and the appeal site are very different architecturally to the buildings in between which predominantly form a long run of an original red brick terrace of similar ridge height. The row has a horizontal appearance in terms of ridges, eaves, fascia boards, cill and lintel heights. However, this is countered with strong vertical elements within the design which serve to break the appearance into individual unit modules” (Paragraph 12).

7.5 The Inspector goes on further to comment (Paragraph 13), that the roofs are also broken into individual unit modules by upstanding projecting party and parapet walls, in addition to the front walls by brick piers. It is noted that the shopfronts are also broken down into unit modules. In the same paragraph, the Inspector highlights the symmetry of fenestration within each unit module, with windows being taller than they are wide with vertical and horizontal glazing bars and the alternating flat and bay windows.

7.6 As such, to the northern elevation fronting the High Street, the Proposed Development has been revised to incorporate:

- Two clearly defined and legible 'unit modules' by, expressing 'party walls', detailing and shopfronts;
- A three-bay window pattern with mullions picking up on the character of the terrace beyond No.40;
- A parapet height reflective of, but marginally taller than, the eaves beyond No.40 expressing its corner location and termination of the terrace; and
- Removing the full height corner element and proposing a recessed storey behind the parapet, which is scarcely visible in the townscape.

7.7 With regard to re-development of the Site, the Inspector indicates that this should *“continue the evolving trend of building styles and the proposed mix of uses would match and complement the character of the Conservation Area”* (Paragraph 31).

7.8 The previous scheme was considered to diminish the perception of No.40 High Street as an individual building due to its scale and proportions, particularly in terms of the *“attic corner”* (Paragraph 35). The revised proposal has reduced the massing of the corner element of the Scheme, introducing a modest mansard roof, of a similar height to the adjoining No. 40- 38 Teddington High Street.

7.9 Taking into consideration the above, the revised Scheme reflects the Inspector's desire for a more constrained approach that is closer to the proportions of Teddington High Street and incorporates a roof design which is similar to the adjoining property to ensure the Proposed Development would assimilate effectively within the context of the surrounding area.

CEDAR ROAD

- 7.10 The commentary with respect to Cedar Road is less explicit, however the salient points made by the Inspector are highlighted below.
- 7.11 The Inspector confirmed that the character of Cedar Road comprises *“traditional late Edwardian/early Victorian two storey houses of similar scale albeit with some differences such as single or double storey bay windows, some with gable roofs, and ornamental detailing. They are of domestic scale and generally set back behind short front gardens”* (Paragraph 21) considered to present a *“harmonious and attractive residential street”* (Paragraph 21).
- 7.12 Concern was raised regarding the scale and form of the previous scheme, with the Inspector outlining that: *“buildings of the scale, form or siting proposed which would be of too stark a contrast in relation to the more extravagant detailing in the High Street row and smaller scale of Cedar Road”* (Paragraph 27).
- 7.13 The design of the previous schemes was also questioned with the Inspector indicating that: *‘neither design has the strong vertical features that would clearly read as two individual unit modules as is strongly evident elsewhere along this part of the High Street. Rather the flat roof stepped elements, the different window proportions, and the paucity of glazing bars would emphasise the horizontal with little by way of vertical balance’* (Paragraph 17).
- 7.14 In this context, the revised proposal is designed as two blocks, each responding to a different context: one to the high street, the other to Cedar Road. This differentiation is achieved through:
- Unit modules which reflect the width of the bays on Cedar Road;
 - Fenestration reflecting the proportions of Cedar Road;
 - A step back of the façade at first floor to create a distinct change between the High Street and Cedar Road frontages; and
 - The building steps back at second floor to align with the building line of Cedar Road.
- 7.15 The previous schemes were considered “monolithic” and “top heavy” in relation to the residential properties on Cedar Road. The Inspector indicated that the impact was “particularly stark” in relation to No. 2 Cedar Road, due to the “bulk of the cube form” and given the “proposals incorporate extensive glazed areas and balconies which would be out of proportion with the simpler, smaller scale, regularly arranged fenestration of the houses on Cedar Street” (Paragraph 23).
- 7.16 The bulk of the revised scheme has been considerably reduced, so that the lower block element of the scheme which sites next to 2 Cedar Road is served by a roof with a ridge height that aligns with this neighbouring property. The Proposed Development has been designed to incorporate features from Cedar Road including projecting bay window features, eaves to match the residential properties and reduced glazing proportions.
- 7.17 The above analysis demonstrates that the revised scheme has picked up “meaningful cues” from Cedar Road “in terms of scale, form or detailing” as raised by the Inspector (Paragraph 26).
- 7.18 With regard to materials, the Inspector indicates that *‘using modern materials that have less geometrical constraints than more traditional materials...do not relate well to this tight grained historical environment’* (Paragraph 24). In response, the revised scheme has been informed by brickwork which is a prevalent material throughout the conservation area. The High Street element is to be dark red multi-hued brick, picking up colour from the west terrace. The Cedar Road element of the Scheme is to be a lighter, yellow hued brick which picks up on the stock bricks present to the south and the white painted properties on Cedar Road.
- 7.19 We conclude, therefore, that Inspector’s comments on design with respect to the development plan policies have been addressed in the revised proposal and in our view, there are no longer any reasons for the scheme to be refused on design grounds.

8.0 CONCLUSION

8.1 This Statement has been prepared by Montagu Evans LLP to assist with the consideration and determination of an application for planning permission and demolition in a conservation area on behalf of Unico Developments Limited to LB Richmond in regards to the proposed redevelopment of 42 High Street, Teddington, TW11 8EW.

8.2 The Application seeks Planning Permission and demolition in a conservation area for the following description of development:

“Redevelopment of the site to provide a mixed-use development comprising Class E at ground floor and basement and eight residential units above.”

8.3 The Proposed Development includes the following:

- Demolition of existing two storey building and replacement with a three-storey building, plus attic storey and a basement;
- New commercial unit at ground and basement floor levels; and
- Eight residential units at first to third-floor levels.

8.4 The Statement has assessed the proposal against the adopted Development Plan, as required by Section 38(6) of the Planning and Compulsory Purchase Act 2004 (As Amended) and regard has been had to S.72(1) of the Listed Building and Conservation Areas Act (1990).

8.5 The proposals present a high-quality scheme which enhances the conservation area both with respect to its character and appearance and fully addresses the Inspector’s comments in the appeal decision letter. The scheme has been developed in consultation with Officers at LB Richmond during pre-application discussions and following public consultation.

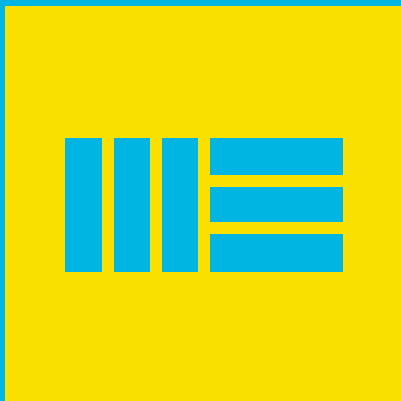
8.6 Having regard to the assessment undertaken within this Statement, the planning benefits arising from the Proposed Development can be summarised as follows:

- The development would deliver eight new units of residential accommodation contributing to the supply of housing within the Borough;
- The proposals would provide residential accommodation of a high standard in a sustainable location in a new sustainable building;
- The proposals present a high-quality design which would respond well to the local context and positively enhances Teddington Conservation Area; and
- The building would introduce active frontages at ground floor serving the new commercial floorspace which will enhance the vitality and viability of the District Centre location.

8.7 The proposals do not give rise to any adverse effects with respect to residential amenity or highway matters. Suitable measures are also proposed to control impacts that may arise with respect to noise, archaeology and arboriculture matters.

8.8 In conclusion, the Proposed Development is considered to be in accordance with the relevant national planning policy guidance and development plan policies when assessing the development plan as a whole. We therefore consider that in the absence of any harmful effects the conclusion rests firmly in favour of planning permission being granted.

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WE CONSIDER OUR CREDENTIALS, HOW WE HAVE STRUCTURED OUR BID AND OUR PROPOSED CHARGING RATES TO BE COMMERCIALY SENSITIVE INFORMATION. WE REQUEST THAT THESE BE TREATED AS CONFIDENTIAL.