PLANNING STATEMENT

Somerset House / 14 Elmtree Road
Teddington

on behalf of
Ashill Developments Ltd

May 2010
2827

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Appendices

1. Ecology Statement prepared by RSK Carter Ecological dated 20th January 2010
SECTION ONE - INTRODUCTION

1.1 This Statement has been prepared to support a planning application by Ashill Developments Ltd for the redevelopment of 14 Elmtree Road and Somerset House, Somerset Road, Teddington.

1.2 The proposal involves the demolition of all existing buildings and redevelopment to provide a total of 58 apartments and houses together with associated access, car and cycle parking, open space and landscaping.

1.3 In addition to this planning statement a number of other documents have been prepared to support this application. These are outlined below:

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<tr>
<th>Document</th>
<th>Consultant/Company</th>
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<td>Landscape Masterplan</td>
<td>Murdoch Wickham</td>
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<td>Ecology statement</td>
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SECTION TWO – SITE AND SURROUNDINGS

2.1 The site shown edged red on the site location plan, attached at Appendix 1, has an area of approximately 0.55ha and accommodates part single, part two and part three storey industrial (B2 use) and office (B1 use) buildings, totalling approximately 45,000 sq ft gross (4,175 sqm gross), together with associated surface car parking. The B2 uses, amounting to approximately 17,800 sq ft gross (1,650 sqm gross), are vacant while the B1 use, amounting to approximately 27,180 sq ft gross (2,525 sqm gross) is part occupied as serviced offices.

2.2 Vehicular access to the site is from 3 separate points along Somerset Road and Elmtree Road. Car parking on site takes place in front of the existing buildings along both Somerset Road and Elmtree Road. A further area of hardstanding between the existing buildings on site and to the rear of properties along Church Road is used for car parking. An additional service access for the industrial buildings is from Elmtree Road.

2.3 The site is not located within a conservation area, nor are any of the buildings on or adjoining the site listed or considered to be buildings of townscape merit. There is no landscaping on the site, although there are semi-mature plain trees within the footway bordering the site along both Somerset Road and Elmtree Road. None of these trees are subject of a TPO but are in the ownership of the Council.

2.4 The surrounding area is mainly residential, characterised by predominantly two storey terraced properties, although there are some larger three storey buildings that are in both residential and commercial uses in the vicinity of the site. There are other land uses within the vicinity including employment uses to the north and a primary school to the south, located on the opposite side of Somerset Road.

2.5 The site is approximately 600m from Teddington town centre which contains a wide range of shops and services. The site has a Public Transport Accessibility Level (PTAL) of 3 with six bus routes passing close to the site (see Transport Assessment). Teddington and Fulwell railway stations, providing services to London Waterloo, Kingston and Richmond are within 900m of the site.
SECTION THREE – RELEVANT PLANNING HISTORY

3.1 The site has a long history of employment use and was occupied up until the late 1980s by Grundys, a company that manufactured metal containers. When Grundy left the site at the end of the 1980’s, the site was sub-divided into two.

3.2 The workshops fronting Elmtree Road were then used by Bollingmores for car repairs/servicing until 2008, since when this part of the site has been vacant.

3.3 That part of the site fronting Somerset Road is in office use. A planning application submitted in 2002 (02/1859/FUL) following withdrawal of application 02/0378, sought to extend the offices by approximately 65 sqm (700 sqft). The application was refused and dismissed on appeal on the grounds of the implications of increased traffic and parking problems.

3.4 There have been no other subsequent relevant planning applications.
SECTION FOUR – PROPOSED DEVELOPMENT

4.1 The proposals involve the demolition of all existing buildings on site and redevelopment to provide a total of 58 apartments and houses in a mix of 1, 2 and 3 bedroom flats and 3 and 4 bedroom houses together with associated car parking, access and landscaping. A summary of the mix of housing is set out in the following accommodation schedule:

<table>
<thead>
<tr>
<th>Unit Size</th>
<th>Total</th>
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<tbody>
<tr>
<td></td>
<td>number</td>
<td>%</td>
</tr>
<tr>
<td>1 bed apartment</td>
<td>15</td>
<td>26</td>
</tr>
<tr>
<td>2 bed apartment</td>
<td>15</td>
<td>26</td>
</tr>
<tr>
<td>3 bed apartment</td>
<td>4</td>
<td>7</td>
</tr>
<tr>
<td>3 bed house</td>
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<td>24</td>
</tr>
<tr>
<td>4 bed house</td>
<td>10</td>
<td>17</td>
</tr>
<tr>
<td>Total</td>
<td>58</td>
<td>100</td>
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</table>

4.2 Vehicular access to the site would be from two points along Somerset Road and Elmtree Road, in broadly the same locations as two of the existing vehicular accesses to the site. The proposed access from Elmtree Road would serve car parking for plots 1-17 and 25-58 while the access from Somerset Road would serve car parking for plots 18-24. The proposals would result in the blocking of two existing vehicular access points to the site. In addition, a pedestrian only entrance is proposed providing access to the site from Somerset Road.

4.3 The layout of the proposed scheme proposes houses and apartments that front onto Somerset Road and Elmtree Road while within the site the proposed buildings are arranged around a central area of open space which has been designed as a focal point, providing shared amenity space for residents of the proposed development.

4.4 The proposed buildings would be three storeys in height, with the top floor set back. The design of the buildings together with the use of materials has sought to provide the development with a contemporary appearance, whilst including materials that will reflect elements of the surrounding buildings.
4.5 Car parking for the proposed development will predominantly be provided within a semi-basement car park, beneath plots 25-58 and the shared open space. There will also be a number of surface spaces located close to those residential units to which they serve. In addition two on-street car club spaces are proposed which would be for use for both existing and future residents. Overall, the scheme provides a total of 86 car parking spaces, a ratio of 1.5 spaces per dwelling, in accordance with the Council’s maximum parking standards of 1 space per 1/2 bed home and 2 spaces per 3/4 bed home. Secure cycle storage will be provided for residents of the apartments, with rear gardens providing cycle storage areas for the proposed houses.

4.6 The proposals would provide 21 no. 1, 2 and 3 bedroom affordable apartments and 5 no. 2 and 3 bedroom affordable houses, 45% of overall housing provision.

4.7 Additional detail on the rationale behind the scheme proposals is contained within the Design and Access Statement which accompanies this application.

Consultation Process

4.8 The proposals have evolved following an extensive pre-application consultation exercise, undertaken by Ashill, which involved discussions both with local residents and key stakeholders.

4.9 There have been two pre-application meetings with Planning Officers in November 2009 and April 2010 to discuss the emerging proposals. The feedback received from these meetings has assisted in the continued design development process. Key issues identified by Officers included those relating to the change in land use, affordable housing provision, car parking and highways implications and the proposed design. The initial proposals were also presented to the Council’s Design Review Panel in December 2009, where the general design approach was supported.

4.10 In parallel to discussions with Officers, one to one meetings have been held between January and April 2010 with local residents and key stakeholders whilst a one day public exhibition was held, in March 2010, at Teddington Baptists Church which was attended by over 100 local residents.
4.11 Overall, the extensive consultation exercise resulted in a number of scheme changes, including an increased parking provision, reduced building heights and amendments to the proposed materials, which have sought to respond to the comments raised and result in an improved scheme that will lead to a number of benefits for the local community.

4.12 Full details of the consultation exercise are contained within the accompanying Statement of Community Involvement prepared by Remarkable Property and Planning Communications.
SECTION FIVE - POLICY CONSIDERATIONS

5.1 The proposed development must be assessed against national planning guidance and the statutory development plan. The statutory development plan comprises the London Plan Consolidated with Alterations since 2004 (February 2008), The London Borough of Richmond’s Core Strategy (April 2009) and the saved policies of the Unitary Development Plan (UDP) (March 2005).

5.2 The Mayor has published a consultation draft replacement London Plan (October 2009) which is to be reviewed at an Examination in Public between June and October 2010. The Council has also published its draft Development Management DPD (January 2010). At this stage, we consider that it would be premature to assess this proposal against these documents as neither document has not been to an Examination in Public and are not scheduled to be adopted until 2011.

5.3 National Planning Policy

PPS1: Delivering Sustainable Development (2005)

5.3.1 PPS 1 sets out the Government’s general approach to delivering sustainable development which is the core principle underpinning planning (paragraph 3).

5.3.2 Paragraph 36 deals with design policy and states

“Key objectives include ensuring that developments:

- are sustainable, durable and adaptable (including taking account of natural hazards such as flooding) and make efficient and prudent use of resources;
- optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;
- respond to their local context and create or reinforce local distinctiveness;
- create safe and accessible environments where crime and disorder or fear of crime does not undermine quality of life or community cohesion;
• address the needs of all in society and are accessible, usable and easy to understand by them; and
• are visually attractive as a result of good architecture and appropriate landscaping"

Planning and Climate Change: Supplement to PPS1

5.3.3 This supplement to PPS1, published in December 2007, sets out national guidance on how planning should contribute to reducing emissions and stabilise climate change.

5.3.4 The guidance states that all planning authorities should apply the following decision making principles when making decisions about spatial strategies:

• ‘The proposed provision for new development, its spatial distribution, location and design should be planned to limit carbon dioxide emissions;
• New development should be planned to make good use of opportunities for decentralised and renewable or low carbon energy;
• New development should be planned to minimise future vulnerability in a changing climate;
• Climate change considerations should be integrated into all spatial concerns….’ (paragraph 10)

PPS4: Planning for Sustainable Growth (2009)

5.3.5 This PPS sets out the Government’s policies for economic development. The principle of Local Planning Authorities considering alternative uses for employment sites is established by criterion (h) of Policy EC2 while criterion (i) states that Local Planning Authorities should ensure that their development plans encourage new uses for vacant or derelict buildings, including historic buildings.
**PPS3: Housing (2006)**

5.3.6  PPS3 was published in November 2006 and sets out national planning policies for housing.

5.3.7  In terms of affordable housing, the government’s aim is for planning policy to assist in providing housing for those that cannot afford market housing, this includes vulnerable people, key workers and those trying to make the step from socially rented housing to home ownership (paragraph 27).

5.3.8  Paragraph 23 states that developers should bring forward proposals for market housing which reflect demand and the profile of households requiring market housing, in order to sustain mixed communities. It continues by stating that proposals for affordable housing should reflect the size and type of affordable housing required.

5.3.9  Paragraph 40 states that it is a key objective that local planning authorities should continue to make effective use of land by re-using land that has been previously developed. Paragraph 45 further states that using land efficiently is a key consideration in planning for housing.

5.3.10 Paragraph 69 states that local planning authorities should have regard to the policies in PPS3 as a material consideration when deciding planning applications and have regard to the following:

- “Achieving high quality housing
- *Ensuring developments achieve a good mix of housing reflecting the accommodation requirements of specific groups, in particular families and older people.
- The sustainability of a site for housing, including its environmental sustainability.
- Using land effectively and efficiently.
- *Ensuring the proposed development is in line with planning for housing objectives, reflecting the need and demand for housing in, and the spatial vision for, the area and does not undermine wider policy objectives e.g. addressing market renewal issues*”
PPG13: Transport (2001)

5.3.11 Paragraph 4 sets out the policy objectives to integrate planning and transport at national, regional, strategic and local level by promoting more sustainable transport choices and promoting accessibility to jobs, shopping and leisure facilities.

5.3.12 Paragraph 13 recognises that “To promote more sustainable patterns of development and make better use of previously-developed land, the focus for additional housing should be existing towns and cities…”

5.3.13 Paragraph 17 “requires parking policies to be framed with good design in mind, recognising that car ownership varies with income, age, household type, and the type of housing and its location”.

5.4 Regional Planning Policy

The London Plan (2008)

Sustainability

5.4.1 The concept of sustainable development runs throughout the London Plan. Policy 2A.1 sets out the criteria to promote sustainable development, including:

- optimising the use of previously developed land…
- using a design-led approach to optimise the potential of sites and improve the quality of life
- ensuring that development occurs in locations that are currently, or will be, accessible by public transport, walking and cycling’

5.4.2 Policy 4A.3 seeks to ensure future developments meet the highest standards of sustainable design and construction including to:

- “make most effective use of land and existing buildings
- Reduce carbon and other emissions that contribute to climate change
• Minimise energy use, including by passive solar design, natural ventilation, and vegetation on buildings
• Supply energy efficiency and incorporate decentralised energy systems, and use renewable energy where feasible.
• Ensure designs make the most of natural systems both, within, in and around the building
• Ensure developments are comfortable and secure for all users
• Conserve and enhance the natural environment, particularly in relation to biodiversity and enable easy access to open spaces.

5.4.3 Policy 4A.6 requires that all developments demonstrate that heating, cooling and power systems have been selected to minimise emissions while Policy 4A.7 states that boroughs should adopt a presumption that developments will achieve a reduction in carbon dioxide emissions of 20% from on-site renewable energy generation unless it can be demonstrated that such provision is not feasible (financially and in practice).

Housing

5.4.4 Local planning authorities are expected to ensure that development proposals achieve the maximum intensity of use compatible with the local context (Policy 3A.3).

5.4.5 Policy 3A.5 recognises the need to improve housing choice and states that Boroughs should take steps to identify housing needs within their area and ensure that:

• ‘new developments offer a range of housing choices, in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups;
• All new housing is built to ‘Lifetime Homes’ standards;
• Ten per cent of new housing is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users…’
5.4.6 Policy 3A.6 relates to the quality of new housing provision, stating that new development should take account of the design and construction policies set out in Chapter 4A.

5.4.7 As regards affordable housing, Policy 3A.9 states that:

“Boroughs should seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes, having regard to their affordable housing targets, the need to encourage rather than restrain residential development and the individual circumstances of the site. Targets should be applied flexibly taking account of individual site costs, the availability of public subsidy and other scheme requirements.”

5.4.8 The Mayor adopts a strategic affordable housing target for the region of 50%, within which 70% of the provision should be social rented housing, and 30% intermediate provision.

5.4.9 Policy 3A.13 addresses special needs and specialist housing stating that Borough policies should provide for special needs housing, including sheltered housing with care support, staffed hostels and residential care homes, for older persons, children and other client groups. Paragraph 3.69 recognises that: “for many people with special housing needs, self-contained permanent housing is more appropriate than shared housing.”

Transport

5.4.10 The London plan conforms to the sustainability principles contained within PPG13. It also aims to make London a more accessible city. The main principle for achieving this is by integrating transport and development (Policy 3C.1). The policy aims to promote this by

“encouraging patterns and forms of development that reduce the need to travel especially by car”
5.4.11 The plan makes provision for improving conditions for pedestrians (3C.21) and cyclists (3C.22) to ensure safe and secure routes. It also promotes accessibility for disabled people within all new developments.

**Design**

5.4.12 Policy 4B.1 sets out the Mayor’s design principles which should include the following to:

- Maximise the potential of the site;
- Promote high quality inclusive design and create or enhance the public realm;
- Respect local context, history, character and communities;
- Be accessible, usable and permeable for all users;
- Be sustainable, durable and adaptable in terms of design, construction and use;
- Address security issues and provide safe, secure and sustainable environments
- Respect the natural environment and enhance green networks and the blue ribbon network.

5.4.13 Policy 4B.3 relates to the enhancement of the quality of the public realm by ensuring that it is accessible, usable and meets the requirements of related policies. It continues by stating that applications will be assessed in terms of their contribution to the enhancement of the public realm.

5.4.14 Policy 4B.5 seeks to create an inclusive environment by ensuring that Boroughs integrate the principles of inclusive design within policy so that developments:

- Can be used safely, easily and with dignity by all;
- Are convenient and welcoming with no disabling barriers, so everyone can use them;
- Are flexible and responsive taking account of what different people say they need and want, so people can use them in different ways.

5.4.15 In respect to safety and security, Policy 4B.6 seeks to ensure that Boroughs create a safe, secure and appropriate accessible environments where crime and disorder and fear of crime do not undermine the quality of life or community cohesion.
5.4.16 The Plan also seeks to ensure that proposed developments preserve or enhance local social, physical, cultural, historical, environmental and economic characteristics (Policy 4B.8).

5.5 Local Planning Policy

Core Strategy (April 2009) & Saved Policies of the UDP (March 2005)

5.5.1 Policy CP19 of the Core Strategy seeks to retain land in employment uses, requiring development likely to generate significant amount of travel to be located in areas highly accessible to public transport (i.e. Richmond and Twickenham town centres) and encouraging the provision of small units. The policy recognises that some sites are inherently unsuitable for continued employment use due to severe site restrictions in terms of access and servicing. This policy has been formed through the evidence base research, including the Employment Land Study 2006. This should be taken in to account when considering proposals for a change of use of employment land.

5.5.2 Saved Policy EMP4 of the UDP re-iterates the Council’s objective to retain employment land in its current use, although the policy does set out circumstances where a change of use to non-employment uses would be acceptable, where:

i) A property is vacant and is returning to its former residential use such as in the case of upper floors above shops;

ii) The existing premises has severe site restrictions in terms of servicing arrangements which would make its continued employment use inappropriate; or

iii) The location of the site has poor accessibility by public transport and its continued employment use would generate large numbers of journeys to work by the private car;

iv) There is provision of evidence that full and proper marketing of the site at realistic prices both for the existing use and for redevelopment (if appropriate) for other employment purposes over an extended period has been unsuccessful.
5.5.3 Where continued employment use or alternative employment generating uses are not considered practicable, the Council may permit residential development in the form of permanently affordable housing

**Sustainability**

5.5.4 Policy CP1 of the Core Strategy requires that all new development conform to the Council’s Sustainable Construction checklist, including the requirement to Code for Sustainable Homes level 3.

5.5.5 Policy CP2 re-iterates London Plan Policy in terms of renewable energy and carbon reductions. It requires that a robust assessment would need to be undertaken as part of the detailed design development process to demonstrate that all potential options have been assessed and that the development will achieve a reduction in carbon dioxide emissions of 20% from on-site renewable energy generation unless it can be demonstrated that such provision is not feasible.

**Housing**

5.5.6 Policy CP14 seeks to ensure that the housing mix of new development contributes to the creation of mixed and balanced communities, and help fulfil the aim to provide for the full range of housing needs. The policy requires that the private sector element of any development include at least 25% of 1 bed units. The policy also requires that all new housing is built to ‘Lifetime Homes’ standards and that 10% of new housing is designed to be wheelchair accessible, or easily accessible for residents who are wheelchair users.

5.5.7 Policy CP15 forms the basis for the provision of affordable housing requiring that new development provide 50% affordable housing in an 80/20 socially rented/intermediate mix unless it can be satisfactorily demonstrated that the proposals are not viable at this level of provision.
Design

5.5.8 Policy BLT11 of the UDP requires a high standard of design of new buildings by complying with criteria set out within this Policy whilst Policy BLT12 seeks to ensure that there is full access for disabled people throughout new buildings. Policy BLT13 states that the Council will, from time to time, prepare supplementary planning guidance to elaborate on various aspects of design and other policy. Policy BLT14 requires the inclusion of landscape proposals within submissions for new development.

5.5.9 In respect to residential amenity, Policies BLT15 & 16 seeks to protect the amenity enjoyed by existing residents and that new development does not constitute ‘uneighbourly’ development.

Transport

5.5.10 Policy TRN2 of the UDP states that the Council will only permit new development where the existing transport infrastructure is able to accommodate the proposals.

5.5.11 Policy TRN4 states that new developments should provide car and cycle parking should be in accordance with the Council’s standards. These standards are set out within appendix A. The maximum residential parking standards for 1 and 2 bedroom units is 1 space per dwelling and for 3 and 4 bedroom units it is 2 spaces per dwelling with 10% of spaces being suitable for drivers with disabilities. The minimum cycle standards is 1 space for 1-3 bed units and 2 cycle spaces for 4+ bed units.

5.6 Supplementary Planning Guidance & LDF Evidence Base

Recycling for New Development (June 2004)

5.6.1 This SPG covers the requirements for recycling facilities which the council expect to be provided in new or converted flats, maisonettes and similar developments with communal facilities, of at least 6 units.
Planning Obligations Strategy (June 2005)

5.6.2 The Council has adopted a tariff based SPD which provides guidance on what planning obligations the Council will seek from new development.

Draft Residential Design Standards (April 2009)

5.6.3 The Council’s draft SPD provides detailed guidance in respect to the design of new residential development, for example guidance on layout and minimum floorspace requirements.

Employment Land Study (November 2009)

5.6.4 An updated employment land study has been undertaken by the Council in order to inform the preparation of its LDF. Whilst the document itself is not a material consideration, the findings are relevant in respect to the redevelopment of the application site. For this reason, a summary of this report is set out below:

5.6.5 Sections 4 and 5 of the Study provides a forecast on the future demand of employment land for the Borough up to 2026 based on guidance outlined within the Employment Land Reviews Guidance Note (DCLG, 2004) and using research information published by the GLA.

B1 Land Use Analysis

5.6.6 In respect to B1 floorspace, the study finds that there is a currently a good supply of second hand / refurbished office premises in the Borough to meet demand from local businesses, yet the area also attracts demand from occupiers which are ‘non-local’ in their origins. The study finds that there is also a relatively high vacancy rate.
5.6.7 The Study’s analysis of the B1 office property market indicates that, there is an acknowledged lack of supply of either new high specification premises or development sites to bring such supply forward. The Study states that local Agents have indicated that, although demand / take up has waned recently, there will continue to be demand for high quality premises / sites, which cannot be met by the current supply of largely second-hand premises.

5.6.8 In its conclusions, the Study considers that there continues to be a strong case for the Council to facilitate improvements in the quality of the supply of office sites and premises in the Borough, but focused in the town centre areas of Richmond, Teddington and Twickenham. The Council seek to do this through Policy CP19 with a target of locating at least 75% of new development floorspace within Richmond and District Centre boundaries.

B2 Land Use Analysis

5.6.10 The Study’s employment projections shows that industrial employment (B2) is forecast to decline by 2.7% per annum on average over the period 2009 to 2026. The Council’s previous Employment Study (2006) concluded that the market for industrial land (B2/B8) was limited in comparison to surrounding boroughs, containing few large industrial estates and a limited demand for land by industrial occupiers. The findings of the 2009 update confirm this conclusion. This limited demand is reflected in our updated forecast, which shows that there is net demand to 2026 for between -6.3 to 0.5 ha of land.

5.6.11 Although demand for industrial land is forecasted to contract slightly over the period to 2026, the GLA identifies the London Borough of Richmond as a Borough of ‘Restrictive Transfer’. The Study states that this being the case means that it is important that the release of industrial land for other uses be limited to those areas, which are the most unsuited to continued B2/B8 land use.
5.6.12 In light of the above, the study recommends that the Council retain existing B2/B8 employment land unless it is inherently unsuitable for employment uses or where appropriate permit a change of use to B1 or B1/mixed uses outlined within the 2\textsuperscript{nd} bullet point of paragraph 5.6.8 above.
SECTION SIX – PLANNING ASSESSMENT

6.1 The following chapter contains and assessment of the development proposals against the Policies outlined within section 5. It establishes that the site is an appropriate location for the proposed development.

Principle of Redevelopment for residential use

6.2 Loss of Employment Floorspace

6.2.1 Whilst the site has a long history of employment use, it is not designated as a strategically or locally important employment site in the London Plan, Core Strategy or the UDP.

6.2.2 Policies CP19 of the Core Strategy and Saved Policy EMP4 of the UDP seek to retain land in employment uses unless certain criteria can be satisfied.

6.2.3 The site has severe restrictions in terms of servicing arrangements in that it is within a predominantly residential area where there is very little off street parking for the surrounding houses and narrow roads. It has a relatively low PTAL rating of 3 and is not therefore a suitable location for development likely to generate significant amounts of journeys to work by car. The site therefore meets with criterion ii) of Policy EMP4.

6.2.4 Highways analysis undertaken by RGP has identified that, based on TRAVL data, the site, if fully occupied in its existing use, would generate a total of 239 vehicle movements and 13 HGV/LGV movements. Its continued use for employment purpose on this scale is not considered to be appropriate for this area, in accordance with criterion iii of Policy EMP4. Indeed, the redevelopment of the site for B1 use would contravene Policy CP19 which seeks to locate development likely to generate significant amounts of travel to be located in areas highly accessible to public transport, with the largest office developments located in Richmond & Twickenham town centres. Indeed, a planning application submitted in 2002 sought to increase the amount of office floorspace was refused partly on highway grounds.
6.2.5 14 Elmtree Road has been marketed for B2/B8 uses since March 2008 and we understand that there has been no viable interest in the site for its current use. It is understood that this lack of interest was due to a number of reasons, including the fact that the existing accommodation is outdated and is in need for extensive and costly renovation and upgrade, the location of the property within a residential area and close to a school restricted the suitability of industrial use and the large amounts of commercial accommodation available in the area in superior locations.

6.2.6 Somerset House underwent refurbishment in 2006 and has been marketed as serviced office space since this date. Even with this extensive marketing, average occupancy of the offices over recent years has only been circa 60%. Further details are provided within the accompanying Employment Land Study and Marketing Report prepared by Bonsor Penningtons. This evidence is considered to comply with the requirements of criterion iv of Policy EMP4.

6.2.7 The recommendations of the Council’s own Employment Study (2009) seek to protect existing office space by encouraging the refurbishment of existing premises. As stated, the current offices at the site have been recently refurbished but continue to be substantially vacant which would appear to support the Council’s Employment Study’s findings that the demand is for new and high quality office space. As previously stated the characteristics of the site would make it an inappropriate location for additional B1 floorspace.

6.2.8 The evidence provided within the supporting Employment/Marketing Study together with the fact that there is a falling demand for B2 floorspace in the Borough means that 14 Elmtree Road is considered an inappropriate location for industrial use. Overall, it is considered that the characteristics of the application site do not make it suitable for continued employment use.

6.2.9 The supporting text to Saved Policy EMP4 of the UDP states that where continued employment use is not practicable, proposals for alternative employment generating uses in the form of health, leisure, tourism, childcare or hotels will be considered acceptable, subject to according with other policies within the Plan (paragraph 9.42).
6.2.10 Due to the site’s characteristics, its poor accessibility and poor servicing arrangements means that the site is considered to be an inappropriate location for significant traffic generating uses such as tourism, health, leisure and hotel uses. As set out within the accompany employment study, during the marketing of the property interest was received from care home and childcare operators, however they did not pursue their interest as the site. On this basis, we do not consider that alternative employment uses would be viable in this location.

6.2.11 Overall, the accompanying employment land study is considered to provide robust evidence to satisfy criterion (ii)-(iv) of Policy EMP4 and demonstrates that there is no demand for other alternative employment generating uses in this location. As such, it is considered that the loss of employment uses in this location is acceptable.

6.3 Acceptability of a Residential only Redevelopment

6.3.1 The supporting text to Policy CP19 states that where sites are unsuitable for employment use affordable housing should be maximised above normal requirements.

6.3.2 The proposals would provide 26 affordable units, 45% of the total housing. The provision of this level of affordable housing is supported by a comprehensive financial viability report that demonstrates that a higher level of affordable housing is neither sustainable nor deliverable. This approach is consistent with Policy 3A.13 of the London Plan and Policy CP15 of the Core Strategy.

6.3.3 On this basis, the principle of the proposed residential only redevelopment would comply with Policy CP19 and Policy EC2 of PPS4 and should be considered acceptable in this location.
6.4 Housing

6.4.1 The proposals would result in the redevelopment of the subject site to provide a mix of housing, with all housing being built to lifetime homes standards and at least 10% being suitable for people in wheelchairs in accordance with Policy 3A.5 of the London Plan, Policy CP14 of the Core Strategy and Policy BLT12 of the UDP.

6.4.2 The proposals would provide a range of housing sizes and types, including smaller 1 and 2 bedroom apartments and larger 3 and 4 bedroom family houses, and would assist in meeting the housing needs of the local community. The proposals would provide 8 no.1 bedroom market apartments in a total of 32 market dwellings (25%). The proposed housing mix is, therefore, in accordance with Policy CP14.

6.4.3 The site is considered to fall within an ‘urban’ setting as defined by the London Plan as the surrounding development is made up of predominantly 2 storey detached houses with some taller buildings. In addition, the site is within 800m of Teddington town centre, a designated District Centre. The overall density of the proposed development (105 dwellings per hectare [358 habitable rooms per hectare]) is therefore within the acceptable density range (i.e. 55 – 145 units per hectare/200 – 450 habitable rooms per hectare). The proposals therefore optimise the development potential of the site, in accordance with Policy 3A.3 of the London Plan and will ensure that the proposals make efficient and effective use of the site, meeting the objectives of PPS1 and 3.

6.4.4 As stated, the proposals would provide 26 affordable units (45%) with a 77/23 intermediate/socially rented tenure split. The affordable housing would be made up of a mix of housing, including 3 bedroom socially rented family housing, an objective of Policy CP15 of the Core Strategy.

6.4.5 Overall, the proposed mix of housing together with the affordable housing provision would make a significant contribution towards assisting the Council in meeting its housing targets, especially given the Council’s low delivery of affordable housing in recent years.
6.5 Design

6.5.1 The overall design objectives have sought to accord with the design principles set out in Policy 4B.1 of the London Plan and BLT11 of the UDP, replicated within the accompanying Design & Access Statement and summarised below.

6.5.2 The design development process has taken into account the characteristics of the site and surrounding area. The proposals have sought to return the urban grain of this area to its predominant residential scale and pattern, ‘repairing’ the damage to the streetscene caused by the existing commercial uses on the site.

6.5.3 In terms of scale, it is proposed that the new houses and apartments would continue the massing and rhythm of the existing housing via the use of vertical elements such as bay windows and stair cores. There is no overriding style to the surrounding housing so it was felt that something following a contemporary design approach, which responded to the existing scale and massing would ensure that the scheme was of a high quality in accordance with the aims of Policy BLT11 of the UDP.

6.5.4 The layout of the scheme seeks to ensure that buildings front onto public areas providing natural surveillance which would lead to a safe environment for the future residents of the development, in accordance with the objectives of Policy 4B.6 of the London Plan.

6.5.5 The proposed layout has been designed in accordance with guidance set out within the Council’s draft SPG on Residential Design Standards. As such, the scheme includes private gardens and open space to provide adequate external space for residents as required by the SPG. The layout also ensures that adequate separation distances are provided between existing and proposed dwellings to protect the privacy for both existing and future residents, in accordance with Policies BLT15 and 16 of the UDP.
6.5.6 An arboricultural assessment has been undertaken by ACD Arboriculture to support the proposals. The assessment identifies that the most significant landscape features are located along the site boundary, along Elmtree Road and Somerset Road. The layout of the proposals ensures that trees worthy of retention are retained and incorporated within the overall scheme. In addition, a landscape masterplan accompanies the application, setting out the proposed new planting which together with the provision of new open space would result in significant improvements to the site’s ecological value. As such, the proposals would be fully in accordance with Policy BLT14 of the UDP.

6.6 Sustainability

6.6.1 A Sustainability Statement by Bluesky Unlimited, has been prepared to support the scheme proposals. This statement sets out how the proposals would comply with the relevant renewable energy planning policies in accordance with Policy 4A.3 of the London Plan.

6.6.2 The Statement, in assessing the most appropriate method of generating renewable energy, identified the provision of two gas fired Combined Heat & Power (CHP) units into the apartment block and to install a total of 72 photovoltaic panels on the roof of the houses, equating to three panels per house. Other technologies have been discounted for a range of technical and practical reasons.

6.6.3 Together, the proposed measures would result in a reduction in carbon dioxide emissions of nearly 29% through the proposed renewable energy measures. These measures meet with guidance outlined within the Supplement to PPS1 and ensure that the proposals comply with Policies 4A.6 and 4A.7 of the London Plan.

6.6.4 In addition, a Code for Sustainable Homes Pre-Assessment has been carried out which show that all homes would achieve Code for Sustainable Homes level 3.

6.6.5 Overall, the scheme would be highly sustainable ensuring that carbon emissions from this site are substantially reduced when compared to the current regulatory baseline thereby being in accordance with Policies 2A.1 and 4A.3 of the London Plan.
6.7 **Highways & Parking**

6.7.1 A Transport Assessment (TA) was carried out by Russell Giles Partnership (RGP) which involved an assessment of existing and proposed traffic levels currently using the site and other highway issues associated with the redevelopment of the site. The existing traffic levels are based on the assumption that the existing buildings are fully occupied.

6.7.2 If fully occupied, the TA anticipated that over the course of a normal day 239 vehicles would enter and exit the site, which includes 13 HGV/LGV movements. The TA anticipates that the proposed residential redevelopment would result, over the course of a normal day, of 165 vehicles entering and exiting the site.

6.7.3 In terms of overall daily traffic flows, the TA identifies that there would be a net reduction of 74 vehicle trips over the course of the day as a result of the proposed development. It can therefore be clearly seen that the new development is predicted to have lower traffic movements than that generated by the current uses, if fully occupied and would result in the removal of HGV/LGV trips to the site. The proposals, therefore, would accord with Policy TRN2 of the UDP.

6.7.4 The proposals would provide a total of 86 car parking spaces at a ratio of 1.5 spaces per dwelling. This provision is in accordance with the Council’s maximum parking standards as set out in Annex A, as required by Policy TRN4 of the UDP. The TA identifies that the average car ownership levels for residents of Fulwell and Hampton Hill ward is 1.14 cars per household. The proposed level of parking is greater than the average car ownership in the ward and as such it is considered unlikely that the development proposals would result in an overspill of parking onto surrounding residential streets.
6.7.5 The proposals provide a total of 40 cycle parking spaces for residents of the 34 apartments, all housed within covered and secured locations while the 24 houses would all have access to rear gardens for the storage of cycles within garden sheds, for example. This overall level of provision is in accordance with standards set out within Annex 2 of the UDP and would improve facilities for cyclists in accordance with Policy 3C22 of the London Plan. The proposals would also include the provision of 2 car club spaces for use by both future and existing residents while the accompanying Travel Plan details measures that would promote the use of the car club as an alternative to private car ownership.

6.7.6 Overall, the proposed development would result in a decrease in traffic on the local highway network when compared to the existing use, when fully let. Together with the improvements to the provision of cycle storage facilities and new car club spaces, the development would encourage more sustainable modes of travel to the site.

6.8 Ecology, Contamination & Drainage

6.8.1 An ecological statement has been prepared by RSK Carter Ecological, and is appended to this document, which identified no habitats suitable for protected species and that the scattered weeds found on site were common, widespread and not of a density that would constitute a ‘brownfield’ habitat. It was also considered highly unlikely that bats or their roosts are present given that no evidence was found and that the existing buildings are generally unsuitable for roosting bats. Overall, the study considered the site to be of negligible ecological value and that the redevelopment of the site is unlikely to have any negative impact on biodiversity.

6.8.2 A detailed Site Assessment has been undertaken by RSK to identify existing levels of contamination. The assessment found that, with a couple of exceptions, none of the samples recorded elevated concentrations of contaminants. The assessment has set out a number of environmental recommendations that would ensure that areas of contamination would be removed prior to the site being redeveloped.
6.8.3 The proposals would include connections to the existing foul sewer network. There are sewers in both Elmtree Road and Somerset Road. The drainage authority has confirmed that there is adequate spare capacity in these sewers to accept the predicted foul flows from the site. Consequently, there will be no adverse impact on the network from the proposed redevelopment.

6.9 Draft Heads of Terms

6.9.1 Circular 05/2005 states that planning obligations can be used to mitigate a development's impact in order to ensure that the proposed development concerned is made to accord with published local, regional and national planning policies. The Heads of Terms of the proposed legal agreement would include the following contributions/obligations:

- Provision and delivery of affordable housing;
- Provision of two car club spaces;
- Financial contribution towards education facilities
- Financial contribution towards health facilities.
- Financial contribution towards other transport improvements.
- Financial contribution towards open space provision.

6.9.2 A financial contribution would be made towards education in order to enable local schools to accommodate the new children living within the proposed development.

6.9.3 It is anticipated that approximately 60 children aged between 0-15 would live in the proposed development, of which 20 are expected to already live within the borough. The large majority are expected to attend state schools in the area. A recent application (ref: 10/0080/FUL) has been approved to extend St Mary’s and St Peter’s Primary School which is opposite the site. This approval would increase the number of places at the school from 453 to 620.

6.9.4 Given the recent extension approval together with the relatively small number of primary school aged children (12) that would live in the development means that it is considered that the scheme would have negligible impact on the ability of other local children to get into the school or not.
6.9.5 The proposed Heads of Terms would be subject to further detailed discussions with the Council's Planning Officers.
SECTION SEVEN – CONCLUSION

7.1 In summary, the supporting documentation demonstrates that due to the site characteristics the current employment uses are no longer viable given the poor access arrangements and lack of demand. Furthermore, a significant amount of vacant B1 / B2 floorspace, of a superior quality and situated in more appropriate locations, is identified elsewhere within the Borough. The principle of a residential only redevelopment is, therefore, considered appropriate in this location.

7.2 The proposals optimise the provision of affordable housing by providing a total of 26 affordable dwellings (45%) in a mix of different unit sizes. The supporting viability appraisal demonstrates that a higher level of affordable housing is neither sustainable nor deliverable.

7.3 The proposals involve the demolition of poor quality buildings, replacing them with a high quality, well designed scheme that will improve the appearance of local area and introducing a use that is consistent with the character of the area.

7.4 The proposed mix of houses and apartments would contribute towards creating a mixed and sustainable community.

7.5 The provision of a central area of shared open space together with private terraces, balconies and rear gardens would provide sufficient amenity space to meet the needs of future residents. The layout of the proposed residential homes would also protect the existing sunlight and daylight levels currently enjoyed by existing residents. The change of use of the site would also significantly improve the residential amenity for existing residents.

7.6 A detailed landscaping plan has been prepared to outline the replacement planting that together with the retention of much of the existing vegetation would lead to an improvement of the sites ecological value.
7.7 The proposals would provide sufficient car parking for future residents in a way that does not dominate the visual appearance of the development. A range of measures would be provided to encourage travel by sustainable means such as cycle parking for all dwellings and two spaces would be provided for a car club.

7.8 The accompanying Transport Assessment identifies that the proposal will not result in an increase in traffic when compared to the existing uses. In fact, throughout the course of the whole day, traffic levels entering the site would be lower than is currently experienced, if the site was fully occupied.

7.9 A number of sustainable measures would be incorporated within the design of the development to ensure that the carbon emissions of the development would be reduced in accordance with national, strategic and local policy objectives.

7.10 It is thereby contended that the proposals accord with national and strategic planning guidance and the policies of the extant development plan.