

Ham Close Regeneration

Planning Application:
Planning Statement

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Planning Statement

Ham Close, Richmond Upon Thames, TW10 7PG

APRIL 2022

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1 Introduction

1.1 This Planning Statement has been prepared by Sphere25 LLP on behalf of Hill Residential Limited (“Hill” / the “Applicant”). It supports a detailed planning application (the “Planning Application”) for the redevelopment of Ham Close, Ham, Richmond Upon Thames, TW10 7PG (the “Site”).

1.2 Full Planning Permission is sought for the following (the “Proposed Development”):

“Demolition of existing buildings on-site and phased mixed-use development comprising 452 residential homes (Class C3) up to 6 storeys; a Community/Leisure Facility (Class F2) of up to 3 storeys in height, a “MakerLabs” (sui generis) of up to 2 storeys together with basement car parking and site wide landscaping.”

1.3 The Planning Application is submitted to the London Borough of Richmond upon Thames (‘LBRuT’) and is referable to the Greater London Authority (the ‘GLA’) by virtue of being a Planning Application of Strategic Importance, comprising development of more than 150 homes (Category 1A).

1.4 The Planning Application is an Environmental Impact Assessment (‘EIA’) application for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended).

The Applicant

1.5 The Applicant an award-winning housebuilder. Awards include being rated a 5 star home builder by the HBF in 2021 and What House Housebuilder of the Year 2021 amongst other accolades. They have built more than 19,000 homes to date and delivered a number of estate regeneration schemes in collaboration with local authority and housing association partners.

1.6 The Applicant is the delivery partner for Richmond Housing Partnership (RHP). RHP is a local housing association established in July 2000 when Richmond Council transferred all its Council owned Housing stock, including Ham Close to the new organisation. RHP are a non-profit organisation with the purpose of providing decent quality, affordable homes and housing related services to people unable to rent or buy in the local private housing market.

Supporting Application Documents

1.7 This Planning Statement should be read in conjunction with the following documents and plans submitted for approval, which are set out below.

Application Document	Author
Planning Drawings	BPTW / WR-AP
Design and Access Statement; <i>including:</i> <ul style="list-style-type: none"> • Existing Site/Demolition Photos • Operational Waste Management Strategy • Landscape Statement • Urban greening and roof details • Play and Child Occupancy Assessment 	BPTW / WR-AP
Planning Statement; <i>including:</i> <ul style="list-style-type: none"> • Affordable Housing Statement • S106 Draft Heads of Terms 	Sphere25
Financial Viability Assessment	DS2
Daylight, Sunlight and Overshadowing Report	Avison Young
Statement of Community Involvement	Cratus
Application Form	Sphere25
Community Infrastructure Levy Form	Sphere25
<u>Transport/Highways</u>	
Healthy Streets Transport Assessment	Velocity
Framework Travel Plan	Velocity
Outline Parking Management Plan	Velocity
Outline Construction Logistics Plan	Velocity
Outline Delivery and Servicing Plan	Velocity
<u>Landscape</u>	
Hard and Soft Landscape Drawings	LUC
Open Space Assessment	LUC
Playing Field Assessment	LUC

Sustainability and Energy	
BREEAM Pre-Assessment	Energist
Whole Life Cycle Carbon Assessment	Energist
Detailed Circular Economy Statement	Energist
Sustainability Statement; <i>including:</i> <ul style="list-style-type: none"> <i>National Water Standards Statement</i> 	Energist
Energy Strategy; <i>including:</i> <ul style="list-style-type: none"> <i>Energy Monitoring Statement (Be seen)</i> 	Energist
Overheating Assessment	Energist
Sustainable Construction Checklist	Hill Residential
Technical/ Construction Reports	
Flood Risk Assessment and Drainage Strategy; <i>including:</i> <ul style="list-style-type: none"> <i>Foul Water Drainage</i> <i>London Sustainable Drainage Proforma</i> <i>Statement on Surface Water Drainage Systems</i> 	Jubb
Utilities Assessment	Hill Residential
Fire Strategy Statement	Affinity
Odour Assessment	Entran
Environmental Statement & Chapters	
Volume 1: Main Text and Figures;	Greengage
Chapter 1 – Introduction and EIA Methodology	
Chapter 2 – Proposed Development and Site Context	
Chapter 3 – Construction	
Chapter 4 – Archaeology	
Chapter 5 – Air Quality	
Chapter 6 – Noise and Vibration	

Chapter 7 – Ground Conditions and Contamination	
Chapter 8 – Ecology	
Chapter 9 – Socio-Economic	
Chapter 10 – Climate Change	
Chapter 11 – Cumulative Impacts	
Chapter 12 – Residual Impacts and Conclusions	
Volume 2: Technical Appendices;	Various
Appendix 1.1: EIA Scoping Report	
Appendix 1.2: EIA Scoping Opinion	
Appendix 1.3: Wind Micro-Climate Assessment	
Appendix 2.1: Site Drawings	
Appendix 3.1: Construction Environmental Management Plan; <i>including:</i>	
<ul style="list-style-type: none"> • <i>Site Waste Management Plan</i> 	
Appendix 4.1: Archaeological Desk Based Assessment	
Appendix 5.1: Summary of Traffic Data	
Appendix 5.2: Verification and Adjustment of Modelled Concentrations	
Appendix 6.1: Glossary of Terms	
Appendix 6.2: Unattended Survey Data, P1	
Appendix 6.3: Unattended Survey Data, P2	
Appendix 6.4: Statistical Analysis Of Background Sound Levels, P1	
Appendix 6.5: Statistical Analysis of Background Sound Levels, P2	
Appendix 6.6: Daytime Noise Contour, 1.5m	
Appendix 6.7: Night-Time Noise Contour, 4m	
Appendix 6.8: Road Traffic Data	
Appendix 7.1: Geo-Environmental Report	
Appendix 7.2: Basement Impact Assessment Scoping, Screening and Assessment	

Appendix 7.3: Ground Investigation, Screening and Suds Assessment Report	
Appendix 8.1: Preliminary Ecological Appraisal	
Appendix 8.2: Bat Emergence Survey Report	
Appendix 8.3: Arboricultural Impact Assessment and Method Statement	
Appendix 8.4: Biodiversity Net Gain Assessment	
Appendix 8.5: Ecological Management Plan	
Appendix 9.1: Health Impact Assessment	
Appendix 9.2: Socio-Economic Calculations	
Volume 3: Heritage, Townscape and Visual Impact Assessment	Savills
Volume 4: Non-Technical Summary (NTS)	Greengage

Table 1: Planning Application Submission Documents.

Structure of the Planning Statement

- 1.8 The purpose of this Planning Statement is to set out the planning rationale that underpins the Planning Application and to demonstrate its acceptability in planning terms. This Statement is structured as follows:
- 1.9 Section 1 provides an **Introduction** to the planning application.
- 1.10 Section 2 describes the **Site and its Context**. This section outlines the site and planning history as well as the physical features and surrounding land uses that characterise the Site.
- 1.11 Section 3 provides the **Background to the Estate Regeneration**, detailing the stock transfer and resident engagement.
- 1.12 Section 4 sets out the **Application Proposals** in detail. This includes references to design, density, scale, mix and other detailed specifications of the scheme.
- 1.13 Section 5 sets out the **Planning Policy Context**. Here, relevant national, London, and local planning policy policies are outlined. The section explains the policy framework against which the application will be considered.
- 1.14 Section 6 provides a **Planning Assessment** of the Proposed Development. This section begins with the principle of estate regeneration, and then considers the appropriateness of the

development's many characteristics. This includes uses, scale and open space provision, amongst other issues.

- 1.15 Section 7 is an **Affordable Housing Statement**. The statement provides further details of the tenure split, phasing of affordable housing and distribution of accessible homes across the development.
- 1.16 Section 8 sets out the relevant **Planning Obligations and CIL** associated with the proposals. This includes potential Heads of Terms for a section 106 agreement and the applicable Community Infrastructure Levy Rates from the Mayor of London and The London Borough of Richmond upon Thames.
- 1.17 Section 9 summarises the key **Planning Benefits** of the proposal. This includes the delivery of an allocated site, improved homes for residents, improved social infrastructure, sustainability improvements and improved amenity amongst other matters.
- 1.18 Section 10 is a short **Summary and Conclusion** of the planning statement.

2 The Site and its Context

Introduction

- 2.1 This section describes the Site and its surrounding context. This includes an appreciation of existing homes, and the surrounding environment and land uses. The section also considers key aspects of the Site, including Access, Ecology, Flood Risk and Heritage constraints. The section also includes a relevant planning history for the Site and the wider area.

Site Description

- 2.2 The Site is located in Ham, in the London Borough of Richmond upon Thames (LBRuT). The Application Site measures 4.69 hectares in area. The existing Site consists of 14 residential blocks; Hatch House, Benson House, Bentinck House, Bowes-Lyon House, Cavendish House, Clarke House, Edwards House, Field House, Greig House, Hawkins House, Hornby House, Leyland House, Newman House and Secrett House.
- 2.3 The Site also contains an existing youth centre, offering a range of after school activities for local teenagers including arts, sport, music, ICT and cooking, and a “MakerLabs” facility offering activities for people with an interest in DIY and craft to learn, repair and create items.
- 2.4 The Site also includes Ham Village Green within its eastern extent, offering a large area of communal amenity space for existing residents (c. 11,800sqm). Ham Village Green is designated Public Open Space (POS)¹ and Other Open Land of Townscape Importance (OOLTI)² within the Local Plan.
- 2.5 Below is a red line boundary map showing the extent of the application area (the “Site”).

¹ Policy LP31 of the Adopted Local Plan, LBRuT.

² Policy LP14 of the Adopted Local Plan, LBRuT.



Figure 1: Site Aerial Location Plan (Bing 2022)

Surrounding Area

- 2.6 The Site is bounded by Woodville Road to the north, and Ashburnham Road to the south.
- 2.7 Ashburnham Road is characterised by two storey pitched roof detached housing. Immediately to the West is the Woodville Centre and St Richard's CE Primary school.
- 2.8 To the East, beyond Ham Village Green and hard standing, is a parade of shops at the confluence of Ashburnham Road and Ham Street. The shops on the parade include an Indian takeaway³, a small convenience store⁴, café⁵, barber⁶, Flooring company⁷, Pizzeria⁸, Dry Cleaners⁹, Fish & Chip shop¹⁰ and Delicatessen¹¹. At the time of this report, 5 out of the 14 shop units are vacant. Above the parade of shops are two storeys of residential flats, accessed by an external stairwell to the rear.

Ham Close - Existing Residential

- 2.9 Ham Close was built in the early 1960s by Richmond Council. The homes were built on the site of Secretts Farm, which was cleared for development in 1958. The 14 residential blocks are configured around two roads that weave north/south across the estate.

³ Jaflong Tandoori, 16 Ashburnham Rd, TW10 7NF

⁴ New Way Food and Wine, 10 Ashburnham Rd, TW10 7NF

⁵ Ham Café, 8 Ashburnham Rd, TW10 7NF

⁶ Nevilles Barbers, 6 Ashburnham Rd, TW10 7NF

⁷ Ashburnham Carpets 4 Ashburnham Road, TW10 7NF

⁸ CC Pizza, 2 Ashburnham Road

⁹ KS Dry Cleaners

¹⁰ Best Grill and Fish Bar

¹¹ Hansel & Pretzel German Delicatessen.

- 2.10 There are three residential building types. These include three linear four storey blocks¹² arranged east-west, with deck access provided on their eastern aspect. Ancillary garages to these blocks are positioned opposite, in parallel. Each of these blocks contain 20 x one bedroom flats.
- 2.11 On the south-western segment of Ham Close are two “T-blocks”¹³ facing Ashburnham Road with parking courts behind. Each Block contains 6 studios and 6 x three bedroom flats.
- 2.12 The remaining 9 residential buildings¹⁴ are five storey square blocks orientated at 45 degrees to the other homes. Arranged around a central core, all but one of these buildings comprise of 4 x studios, 7 x two bedroom and 1 x three bedroom homes each.
- 2.13 Ham Close consists of both affordable and market homes; the latter having been acquired under right to buy and are referred to as “leaseholders” in this planning statement. The existing affordable homes consist of 132 RHP affordable tenanted homes and 9¹⁵ short term lets to the Council (LBRuT) for temporary accommodation.
- 2.14 Figure 3 provides a breakdown of the existing properties on the estate by bedroom type, Gross Internal Area (GIA) of each home and tenure type.

	Studio	1 Bed	2 Bed	3 Bed	3 Bed (v2)	Total
Av. Area GIA (m²)	31.87	45.09	64.17	72.74	78.7	N/A
Leaseholder No	4	14	24	3	4	49
Leaseholder Area	127.48	631.26	1540.08	218.22	314.8	2831.84
Affordable Rent	44	46	39	9	5	143
Affordable Rent Area	1,402.28	2,074.14	2,502.63	654.66	393.5	7,027.21

Table 2: Existing Homes by Area and Number.

- 2.15 The existing homes pre-date the Nationally Described Space Standards. None of the blocks include lifts, with access reliant on a central stair core. Furthermore, the homes do not have their own private amenity space, either in the form of a balcony or terrace. These are fundamental constraints. Nonetheless, RHP have invested in refurbishing the homes, and the properties do meet the Decent Homes Standards following renovations undertaken in 2003.

Existing Community Centre

¹² Clarke House, Hornby House and Greig House

¹³ Hatch House and Hawkins House

¹⁴ Field House, Edwards House, Leyland House, Newman House, Secrett House, Bentick House, Cavendish House, Benson House and Bowes-Lyon House.

¹⁵ Until recently, there were 11 short-term lets, and this higher number has been used for the purposes of affordable reprovision (143).

- 2.16 Ham Close is home to an existing Community Centre. The facility is referred to as Ham Youth Centre or Ham Hall. The total Gross Internal Area (GIA) of the building is 615m². This includes a small basement area of 57m².



Figure 2 : Ham Youth Centre (Google Maps 2022)

- 2.17 The current youth club offers a range of after school activities for local teenagers including arts, sport, music, ICT and cooking. The current youth club has had 316 young people visit more than 3 times over the last year. The centre is also home to TAG, a club aimed at empowering and optimising potential of children and young people aged 8-25 who have a disability¹⁶.

The MakerLabs

- 2.18 Nestled within Ham Close is the “Richmond MakerLabs (RML)¹⁷”. The MakerLabs is a single storey building located in the former caretaker’s store on Ham Close.
- 2.19 The MakerLabs is understood to be the only facility of its kind in south-west London, for people with an interest in DIY and craft to learn, repair and create items. The current facility provides two events weekly, a group for the whole community and a group for members. Members of the community come to work on their own projects and seek guidance and knowledge from other members. There is a wide array of activities that are provided including woodwork, repairs, model-making, electronics.
- 2.20 RML is run by local enthusiasts and is part of Ham United Group (HUG). It is a Community rather than Commercial enterprise.

¹⁶ See dedicated website [Home | TAG Youth Club](#)

¹⁷ See dedicated RML Website [Richmond Maker Labs](#)

- 2.21 The existing building has a functional area of 68m², utilising outside area and reduced height mezzanine. Without these areas, the building has a Gross Internal Floor Area (GIA) of 47m².



Figure 3 : Richmond Makers Lab Google 2022.

Access

- 2.22 The Site has a Public Transport Accessibility Level (PTAL) of 1b. There are no train stations within typical walking distances (800m). Richmond railway and underground station is located approximately 3km away. Bus routes K5, 372 and 65 operate in the vicinity of the site and connect to Richmond and Kingston. There is a route 372 bus stop on Ashburnham Road.
- 2.23 Vehicular Access and Egress is provided at two points on Woodville Road and two points on Ashburnham Road.
- 2.24 The Site includes approximately 228 parking spaces and 47 garages. The parking spaces are located at ground level in informal hard standing areas. Bays are not marked. There are no designated wheelchair parking spaces on site. There is no Controlled Parking Zone (CPZ) in place on or around the Site.

Nature Conservation

- 2.25 The Site is not subject to any International, European, or National ecological designations. The Site is not situated within any 'sensitive areas' as defined within the EIA Regulations. The Site largely comprises of buildings and hardstanding surrounded by short amenity grassland

and scattered trees. Whilst not subject to any ecological designations, the Site has potential to support nesting birds and roosting bats.

- 2.26 Ham Close is located 1.3km from the boundary of Richmond Park which is designated as a National Nature Reserve, Site of Special Scientific Interest (SSSI) and Special Area of Conservation (SAC).
- 2.27 There are no Tree Preservation Orders (TPOs) affecting the Site. However, a number of mature and semi-mature trees exist within the Site and abut its boundaries. There are four category 'A' trees present on the Site¹⁸.

Heritage & Archaeology

- 2.28 The Site itself is not located within a conservation area and does not contain any statutory or locally listed buildings. The Site is not situated within any local or strategic viewing corridors or their buffer areas¹⁹.
- 2.29 Immediately to the East of the Site is the Ham House Conservation Area. To the South-East of the Site lies Ham Common Conservation Area. Within the conservation areas there are a number of Heritage assets. This includes Ham House, which is a Grade 1 listed building²⁰ within a Registered Park and Garden.
- 2.30 The west of the Site lies within the Archaeological Priority Area (APA) of Ham Fields²¹.

Flood Risk

- 2.31 The Site is located within Flood Zone 1, where it is considered that there is less than 0.1% chance of flooding in any year.

Ground Conditions

- 2.32 No significant sources of potential contamination have been recorded on or adjacent to the Site. The British Geological Survey (BGS) indicates that the site is underlain by the Kempton Park Gravels and London Clay.

Site Area History

- 2.33 Originally farmland and constructed in the early 1960s, the Site has an unremarkable planning history. There is no record of any subsequent planning applications at Ham Close following the Site's construction in the early 1960s.

Wider Planning History

¹⁸ Two Lombardy Poplars; 1 x Pine and 1 x Silver Maple

¹⁹ The application nonetheless considers the following Vistas: (Vista 11 Ham House (210m to the east) and Vista 13 – Douglas House (400m to the north east)) and Views (View 004 - View from near Ham House to Orleans House and View 005 - View to Marble Hill House (north)).

²⁰ Listed 10th January 1950. UID 1080832

²¹ Reference: DLO33496

- 2.34 Immediately adjacent to the Site, a planning application is due to be submitted for a new-Multi-Use Games Area (MUGA), altered access and vehicle arrangement at the Woodville Centre. The applicants are the London Borough of Richmond upon Thames (LBRuT).
- 2.35 Beyond the immediate vicinity, the application has considered other notable planning applications²² within a 1 mile radius. Appendix 1 documents relevant schemes in the London Boroughs of Richmond upon Thames and adjoining Kingston from 2016 to 2022. These applications have also been considered as part of the Environmental Statement by Greengage.

²² “Notable” criteria being 25+ units or developments in excess of 1,000m². Geographic distance being within a 1 mile radius of Ham Close, TW10 7PG.

3 Background to the Estate Regeneration

Introduction

- 3.1 This section sets out the background to the regeneration of Ham Close. This includes an overview of the recent history of the Site; the resident engagement that led to the decision to pursue a redevelopment rather than refurbishment of the properties; and the appointment of Hill as applicants and delivery partners. This section also includes information regarding commitments to residents.

Background

- 3.2 Ham Close as it exists today was built by Richmond Council in the early 1960s. Prior to the current blocks, the Site was occupied by pre-fabricated houses for military servicemen following World War 2. A previous Manor Farm House on the remainder of the Site made way for the shops and flats at Ashburnham Road in 1958.
- 3.3 In July 2000, the Council transferred all Council Homes across the borough to Richmond Housing Partnership (RHP). RHP was established as a not-for profit housing association. Ham Close formed part of the original stock transfer.
- 3.4 RHP undertook a comprehensive refurbishment of the properties to meet Decent Homes Standards by 2003.

Refurbishment vs Redevelopment

- 3.5 In 2013, The Prince's Foundation for Building Communities were invited by RHP and Richmond Council to work with residents, businesses and local organisations, to consider the future of Ham Close. Specifically, what improvements they would like to see, and to develop a vision for the area.
- 3.6 Ham Close residents supported the principle of redevelopment and helped inform key elements of the regeneration. The feedback would later be incorporated into a formal design brief for further consideration. In April 2015, BPTW architects were appointed to carry out an options appraisal. This included both refurbishment and redevelopment options.
- 3.7 Following the options appraisal a consultation was held on the future of Ham Close in 2016. BMG, an independent research company, administered the survey and undertook the analysis. 61% of RHP tenants and homeowners from Ham Close completed the survey and there was net agreement (more people agreed than disagreed) that a redevelopment of the Close would benefit them / their household as well as others living on Ham Close and the wider community.
- 3.8 A number of workshops took place during 2016. At the workshops experts were on hand to help attendees understand key issues, any constraints and explore possible ideas. 40 spaces were available at each workshop and all but one of the workshops were repeated to maximise

participation. The workshops included Financial Viability, Traffic & Transport, Design Approach, Open Space & Landscaping, Community Facilities & Local services; and impact of construction.

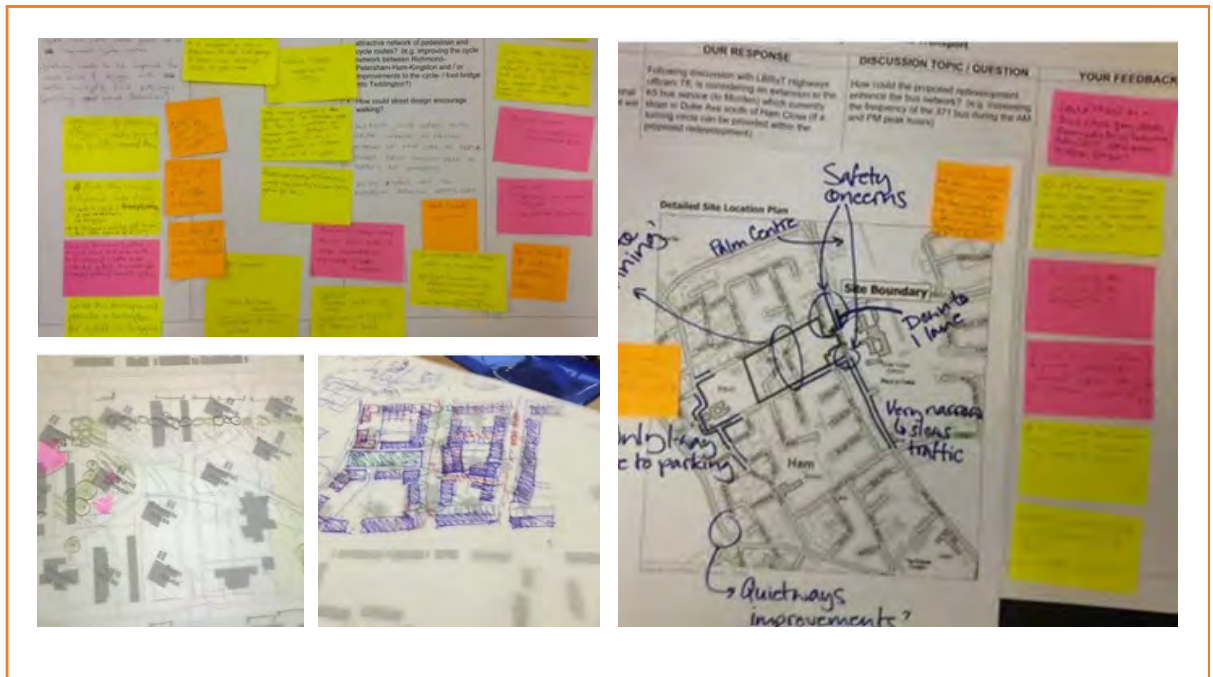


Figure 4: Examples of Workshop notes from participants (Source: RHP)

The Customer Offer

- 3.9 From 18 July 2018, the Mayor of London introduced a requirement that any landlord seeking GLA funding for estate regeneration projects which involve the demolition of social homes to show that residents have supported their proposals through a ballot. This is to make sure that GLA funding only supports estate regeneration projects if residents have had a clear say in plans and support them going ahead.
- 3.10 There are exemptions to the Mayor’s ballot including transitional arrangements for projects that were already under way when the resident ballot requirement was introduced, as is the case for the Proposed Development, where GLA funding was committed prior to 18 July 2018²³.
- 3.11 Although Ham Close has an exemption from the Mayor’s Ballot RHP have nonetheless sought to undertake consultation and resident engagement in accordance with best practice.
- 3.12 The feedback from the workshops led to the formulation of a draft masterplan, and a “Customer Offer” to residents if a redevelopment were taken forward. The customer offer was, and remains, an integral part of the regeneration commitment to residents.

²³ CERTIFICATE

- 3.13 The Customer offer was subject to consultation with residents, and was also subject to an external review by TPAS²⁴ during 2017. At the time, TPAS concluded “To date RHP has followed good practice and produced a clear and detailed offer document. All the promises meet or exceed what is expected.”


TENANT ENGAGEMENT EXPERTS 

Table 1. Summary of RHP’s offers to homeowners

1. The scheme is compliant with London housing design standards	Met
2. Remain at Ham Close and the offer of new home	Met and exceeded
3. RHP will establish a market value for the homeowner’s existing property through a Royal Institute of Chartered Surveyors (RICS) valuation	Met
4. Pay the costs of a nominated surveyor to carry out a further valuation	Met
5. Compensation for home-loss	Met and exceeded
6. Offer of a new lease	Exceeded – no requirement
7. Help with the cost of moving	Met
8. Shared equity scheme	Exceeded – no requirement

Table 2. Summary of RHP’s offers to non-resident homeowners

Home-loss compensation	Met and exceeded
Offer of a new larger home at full market value	Met and exceeded
Shared equity scheme	Exceeded – no requirement

Figure 5: Excerpt from TPAS Review of Ham Close Regeneration Offer Document 2017²⁵

- 3.14 RHP had been acquiring properties at Ham Close prior to December 2019 when available. In December 2019, RHP wrote to all leaseholders advising them of the Customer Offer to start buying back homes from those interested in selling (to include 10% value uplift plus disbursements). For some leaseholders this has led to them selling their homes to RHP and moving, whilst for others who are either undecided or are interested in staying, it has left them in a more informed position.

Hill Residential as Development Partners

- 3.15 During 2020, RHP, with the support of Richmond Council, undertook a two-stage procurement process for a development partner for the regeneration of Ham Close.
- 3.16 The involvement of the Resident Engagement Panel provided feedback to the final bidders and RHP’s Regeneration Team ahead of the scoring of the developers’ submission and

²⁴ Known as Tenants Participation Advisory Service up until 2016 before the acronym was removed.

²⁵ Ham Close Regeneration. Review of the Offer Document ‘What Regeneration could mean for you’ TPAS, September 2017.

concept plans in February 2021. Hill were subsequently chosen as development partner in the summer of 2021.

- 3.17 Following appointment, Hill undertook significant consultation on the masterplan design. This included presenting at Forum groups, workshops and wider public consultations. Whole day public exhibitions took place in person on the 23 & 24 July 2021 and the 25th and 26th March 2022. Full details of the extensive consultation is outlined in the accompanying Statement of Community Involvement (SCI) by Cratus.

LPA and Stakeholder Engagement

- 3.18 The Applicant has undertaken a number of pre-application meetings with the Local Planning Authority since the appointment of Hill Residential as the delivery partner. The Applicant entered into a Planning Performance Agreement (PPA) with the Council in July 2021, and specialist design, landscape, and heritage expertise has helped shape the proposals.
- 3.19 A total of 8 pre-application meetings have taken place with LBRuT, including representatives from the Planning, Housing and Transport teams, in addition to pre-application meetings with officers from the Greater London Authority (GLA).
- 3.20 The scheme has also benefited from a presentation to the Richmond Design Review Panel, including a follow-up presentation to the Panel following receipt of detailed written feedback from the first session.
- 3.21 Further information on pre-application feedback received from the LPA and other stakeholders, and the resultant positive design development, can be found within the submitted Design and Access Statement (DAS).
- 3.22 Following submission of this Application, the Applicant will continue to correspond with interested parties to ensure they are fully apprised of the proposals and their progress.

4 The Application Proposals

Introduction

- 4.1 This section provides an overview of the Planning Application and its specifications. This includes key parameters relating to Use, Floorspace, Affordable Housing, Scale, Design, Amenity Space and Parking.

Description of Development

- 4.2 The proposed description of development is:

“Demolition of existing buildings on-site and phased mixed-use development comprising 452 residential homes (Class C3) up to 6 storeys; a Community/Leisure Facility (Class F2) of up to 3 storeys in height, a “MakerLabs” (sui generis) of up to 2 storeys together with basement car parking and site wide landscaping.”



Figure 6 : Proposed Site Plan (BPTW Architects 2022)

Design Layout

- 4.3 The Application design is based on four distinct character areas. These are referred to as the “Village Green”, “The Linear Park”, “Ashburnham Road” and “Woodville Road”. A breakdown of the character areas is shown below.



Figure 7: Character Areas (BPTW Architects 2022)

- 4.4 The “Village Green” are those buildings immediately fronting Ham Village Green. Here, a more legible threshold to Ham Close is created through four blocks²⁶ which directly address the Green. Each building is orientated to ensure the slim edges of each block is presented to the open space. The generous spacing between the two centre blocks of 24m creates a wide gateway and arrival space that flows between the existing open space and the proposed development. The built footprint remains within Ham Close, and does not incur on to the designated Ham Village Green itself.
- 4.5 A pedestrian friendly environment surrounds each of the areas interfacing with Ham Village Green. There are no vehicle parking areas or access roads in front of the buildings, with internal roads situated deeper into the Site. This creates a more functional public realm whilst sensitively preserving the environment of Ham Village Green.
- 4.6 The Linear Park provides the key green infrastructure running through the heart of the site. The decision to arrange buildings around the green spine drew notable support in early resident engagement. Measuring 4,628m² the substantial open space is a safe pedestrian environment devoid of cars.
- 4.7 Framing the linear park are six blocks²⁷. Whilst this area shares a common character, distinct architectural approaches are taken on each of the buildings. Within the family of buildings, a

²⁶ Annotated Blocks O, M, V and U.

²⁷ Annotated Blocks E, I, M, C, R and S.

feature building is included²⁸ to provide an attractive design flourish within the development. Its position within the Site is purposeful and not intended to be a dominant or discordant landmark in the wider townscape.

- 4.8 The new Linear park vista is completed with the “MakerLabs”, providing a direct pedestrian and visual connection with Ham Village Green.
- 4.9 The Ashburnham character area forms the southern portion of the Site. Buildings within this character area transition in both the scale and typology mediating between the Urban grain of the Linear Park with existing suburban housing beyond. The Woodville Road character area also transitions the scale and typology of the buildings from an Urban to Suburban setting²⁹ with existing homes to the north.
- 4.10 In addition to the above character areas, the proposal also includes a new Community Centre. The Community Centre is located on existing hardstanding to the rear of the shops on Ashburnham Road. The location of the Community Centre was informed through resident and wider community consultation dating back to 2017.
- 4.11 The proposed location of the Community Centre in this new position will be more accessible for the wider community, whereas the existing centre is often mistaken as being part of the estate only. It is immediately opposite the existing bus stop, and will address Ashburnham Road. The centre will also be immediately next to the existing parade of shops, helping to improve the vitality and viability of these businesses through immediate footfall.

Design Appearance

- 4.12 The design appearance has been finessed through detailed feedback during the pre-application process. The proposal combines a high-quality aesthetic appearance with functional design. Utilising traditional brick as the main material, the buildings are both robust and attractive. The use of brick provides a unified appearance across the development, but with variations in brick type to reflect the eclectic mix of local buildings.
- 4.13 Extensive work has been undertaken on façade development. Each building has a carefully considered rhythm of brick bays and windows, with protruding and recessive elements to provide a texture and grain to its appearance.

Height & Scale

- 4.14 The majority of existing blocks are five storeys tall (9 of the 14). The Proposed Development contains a range of building heights across the development. Buildings step in height to the Linear Park, ensuring the tallest buildings are located centrally and are well contained within the Site. This follows good urban design practice, as well as the Character analysis that has underpinned emerging planning policy for the Site³⁰. Scale is restricted to a maximum of six

²⁸ Block R

²⁹ Annotated Blocks W, D, P, Q & T.

³⁰ See Urban Design Study 2021, LBRuT. Mid Rise Building Zone (5-6 storeys) Ham Close.

storeys, with the highest storey set back from the main footprint. The Building Heights are summarised below. It should be noted that the floor to ceiling height for commercial and community space is greater than residential.

- 4.15 The scale of the buildings has been subject to rigorous technical design and verified views are provided in the accompanying Heritage Townscape and Visual Impact Assessment (HTVIA) by Savills Heritage.

Block ³¹	Storeys	Ground Level	AOD	Structure
A	4	7.200m	20.475m	13.275m
B	4	7.200m	20.475m	13.275m
C	5/6	7.300m	27.175m	19.875m
D	4	7.500m	20.775m	13.275m
E	5/6	7.300m	27.175m	19.875m
F	3	7.200m	17.025m	9.825m
G	3	7.200m	16.650m	9.450m
H	4	7.100m	20.460m	13.360m
I	5/6	7.300m	27.175m	19.875m
J	4	7.100m	20.460m	13.360m
K	3	7.200m	16.650m	9.450m
L	3	7.200m	17.025m	9.825m
M	5/6	7.300m	27.175m	19.875m
N	4	7.100m	20.375m	13.275m
O	4	7.000m	20.275m	13.275m
P	3	7.700m	19.770m	12.070m
Q	3	7.700m	19.370m	11.670m
R	5	7.300m	23.650m	16.350m
S	5/6	7.300m	27.175m	19.875m
T/U	4	7.500m	20.775m	13.275m
V	5/6	7.300m	27.175m	19.875m
W	4	7.500m	21.225m	13.275m

Table 2: Proposed Building Heights

³¹ Building Heights taken to Highest ridge height for pitched roofs and maximum parapet height for flat roofs.

Proposed Residential

- 4.16 The residential component of the proposal comprises 452 mixed tenure homes. The following table provides a breakdown of the accommodation by bedroom size.

Bedroom	Number	Percentage
Studio	4	0.8%
1 Bed	220	48.7%
2 Bed	165	36.5%
3 Bed	21	4.6%
4 Bed	34	7.5%
5 Bed	8	1.8%
TOTAL	452	100% ³²

Table 3: Housing type by Bedroom Typology

Density

- 4.17 The proposed development has a density of 96 units per hectare, or 271 habitable rooms hectare³³.

Affordable Housing

- 4.18 The development includes 221 Affordable Homes. This includes the reprovision of 143 affordable rent homes based on current affordable housing needs at Ham Close. Leaseholder reprovision is not included in the affordable housing calculation.
- 4.19 The additional affordable homes include a further 21 affordable rent, 10 London Living Rent and 47 shared ownership homes. This represents 49% affordable housing on a unit basis. The number of affordable habitable rooms is 551. This equates to 43% affordable housing on a habitable room basis.
- 4.20 The scheme is designed to be tenure blind. The affordable housing blocks will not be distinct from private housing or confined to one area of the Site. Each of the character areas include a mix of tenures. This includes both market housing and affordable housing addressing Ham Village Green.
- 4.21 The location of the affordable housing has been largely dictated by the phasing of the scheme and the desire to avoid multiple moves for existing residents. Indeed, the majority of affordable homes will come forward in Phases 1 and 2 – thereby prioritising affordable

³² Numbers do not add due to rounding.

³³ Based on the site area of 4.69 Hectares. Numbers rounded for whole numbers.

housing delivery over market sale. This is detailed in the affordable housing statement in section 7.

Tenure	Studio	1 Bed	2 Bed	3 Bed	4 Bed	5 Bed	Total
Affordable Rent Re provision	0	93	37	13	0	0	143
Affordable Rent Additional	0	8	10	3	0	0	21
London Living Rent	0	7	3	0	0	0	10
Shared Ownership	0	22	24	1	0	0	47
Leaseholder	2	7	17	4	0	0	30
Market	2	83	74	0	34	8	201
Total	4	220	165	21	34	8	452

Table 4: Affordable Housing by Bedroom and Tenure

Wheelchair Homes

- 4.22 90% of homes are designed to comply with Approved Document Part M Category 2 (Accessible and Adaptable Dwellings) and 10% of homes are designed to comply with Category 3 (Wheelchair User Dwellings). The landscaping, Community Centre and MakerLabs have also been designed for wheelchair use.

Residential Quality

- 4.23 83% of all homes proposed are dual or triple aspect. There are no single aspect north facing homes. Each home will have a positive outlook and good access to daylight and sunlight. All homes meet or exceed planning space standards³⁴. This represents a notable improvement on the existing areas within the current homes on the Site.
- 4.24 Each home will have access to dedicated private amenity space in form of balconies or private gardens in line with the London Plan³⁵. Each home will have a terrace or balcony at a minimum of 5m² for 1-2 person homes, increasing by 1m² for every additional occupant. All

³⁴ Nationally Described Space Standards (March 2015)

³⁵ London Plan (2021)

private external spaces will have a minimum depth and width of 1.5m. None of the current homes have access to a balcony or private amenity space.

Open Space

- 4.25 The proposals will include 14,675m² of Public Open Space. This includes 2,772m² of communal space for residents and 6,568m² of private residential amenity space.

Child Play Space

- 4.26 Currently there is no Child Play Space within the Ham Close estate. Instead, children are reliant on the adventure playground located on Ham Village Green. Children's play space is incorporated throughout the proposed scheme, providing a total of 1,744m² for children aged 0-11 years, in addition to existing play equipment on Ham Village Green and other local facilities including Riverside Drive, Ham Playing Fields and King George's Field.

The MakerLabs

- 4.27 The proposals include a new MakerLabs. The replacement building is both larger in area and more functional in layout. The current building is unprepossessing. The absence of any features or prominent signage explains why many local respondents in the community were unaware of the facility on site.
- 4.28 Acknowledging this, the new Makerlabs is notably distinct from the residential buildings that form the surrounding Ham Close. The building purposefully departs from the residential brick vernacular. Designed by local architects WR-AP, the new facility has taken design inspiration from the former farm buildings that occupied the Site prior to Ham Close. The form of the building includes a pitched roof, and the palette of materials is focussed on timber creating a barn aesthetic that reflects both the history of the Site and the hands-on artisan and small-scale engineering activities that will take place inside.
- 4.29 The current MakerLabs space in the caretaker's store is too small for the equipment needed and demand from the community. MakerLabs have retrofitted their services into the cottage as best they could, but the space was not designed for them. Offers of donations of tools must currently be refused as there is for no space to keep them. Opportunities to repair equipment over more than one session must be refused due to lack of storage space for work in progress despite there being demand.

	Existing (GIA) m ²	Proposed (GIA) m ²	Proposed (GEA) m ²
Maker Labs	47 ³⁶	130	164

Table 5: MakerLabs Areas

The Community Centre

- 4.30 The design of the community centre has been subject to significant design iterations as the proposals have been finessed through the pre-application process. Following resident feedback, it was decided early on in the resident consultation that a replacement community centre would be better relocated “*by the shops*”³⁷.
- 4.31 Such a position has a number of benefits. Logistically, it can be built immediately and does not require the demolition of any existing homes or facilities. This allows continuity for users with no interim loss of facilities. The more prominent location also provides greater accessibility for the wider community. There are also synergies between the recreational use of Ham Village Green and the Community Centre. Finally, the existing hard standing represents under-utilised land used for occasional parking. By situating the community centre in this location, it enables a better optimisation of residential homes at Ham Close.

	Existing (GIA) m ²	Proposed (GIA) m ²	Proposed (GEA) m ²
Community Centre	615	716	1,179

Table 6: Community Centre Areas

- 4.32 There is a modest increase in the size of the Community Centre (101m²). At 3 storeys in height, the building is sensitively proportioned to the immediate context of the shops and Ham Village Green. The proposed design includes a wealth of design detail. At ground floor, a loggia is incorporated, reflecting the rich heritage of Ham House. This is a functional response to the required dimensions of the hall at first floor, but also a positive interaction with Ham Village Green at pedestrian level.
- 4.33 The Ground floor consists of a Community Lounge, Community meeting room, toilets and small kitchen. Meanwhile the larger first floor includes the main activity hall of 190m² together with associated changing rooms, storage and a meeting room. The second floor includes a music space for rehearsals, a studio, storage and an ICT³⁸ room.

³⁶ Excludes restricted head height mezzanine and outside storage as per RICS measurement. Inclusion of additional areas would be approximately 68m²

³⁷ Headline Consultation Responses January 2017, Uplift Ham, Richmond Council and RHP.

³⁸ Information Communication Technology.

Car Parking

- 4.34 The proposal includes 287 car parking spaces. Of these 274 are attributable to the residential homes. Two wheelchair parking spaces are provided for the Community Centre and a single wheelchair car parking space is provided for the MakerLabs.
- 4.35 A key element of the design is the inclusion of a basement car park. This approach was well received by residents and the wider community. The basement includes the provision of 238 spaces.
- 4.36 The Basement is located centrally in the Site enabling direct access from the 8 cores of the central spine of buildings. Surface parking is limited to 49 spaces only. The inclusion of a basement car park also allows the Energy Centres and plant to be located underground. This allows for larger plant rooms and an efficiency of pipework and kit.
- 4.37 The proposal includes 14 residential blue badge car parking spaces (3%), with provision for an additional 32 spaces (7%) should demand require. There are also two additional spaces for a car club.
- 4.38 Electric Vehicle Charging Points (ECVPs) are provided on the ratio of 20% “Active” and 80% “Passive”. (“Active” being spaces with Charging Points already in place and “Passive” being spaces with electrical infrastructure integrated for additional points in the future).

Cycle Parking

- 4.39 The proposal includes 790 long term cycle spaces for residents with a further 13 short term spaces for visitors. Long stay Cycle Spaces are provided on the following ratios: 5% accessible spaces (2.0m long by 1.0m wide); 10% Sheffield stands spaced 1.0m apart and 85% 2-tier stands.

Energy & Sustainability

- 4.40 The proposals have adopted a fabric-first approach to design to minimise heat loss and energy requirements. The scheme also includes a phased site-wide communal Air Source Heat Pump (ASHP) network. This comprises of two separate energy centres. The first will serve Phase 1 of the development, and the second serving Phases 2 and 3 of the development. Individual ASHP will serve the houses. These renewable technologies will be complemented with solar photovoltaics (PVs) on suitable roof space.
- 4.41 In-line with the move to “decarbonise the grid”, the scheme will be all-electric for heating, cooling, and hot water generation. Technical consultants Energist estimate that the development will achieve a total reduction in regulated CO₂ emissions of 66% over the Target Emission Rate (TER)³⁹.

³⁹ Approved Document Part L (AD L) 2013

4.42 All new dwellings included in the application proposals have been designed to meet a maximum water consumption rate of 105 litres per person per day.

Biodiversity

4.43 The development will achieve an Urban Greening Factor (UGF) of 0.48, exceeding the 0.4 requirements of the London Plan. Furthermore, the scheme will also achieve a biodiversity net-gain of 23.2%.⁴⁰

4.44 Whilst no roosting bats have been observed as part of the Specialist survey work by Greengage, the scheme includes the provision of bat boxes as part of the development.

4.45 Biodiverse roofs are proposed for all the flat blocks and cover more than 70% of the available roof plate for those areas over 100m².

4.46 A tree survey has informed the development proposals. Whilst it is inevitable that a number of trees will need to be removed to facilitate the development (41), a significant number are retained (46) alongside the introduction of new trees (124). Overall, there will be a notable net gain in trees (+83).

⁴⁰ See Greengage BNG calculation in Environmental Statement.

5 Planning Policy Context

Introduction

- 5.1 This section summarises the key national, regional (London) and local planning (LBRuT) policies against which the Planning Application will be determined. It will also consider other documents that constitute material planning considerations and may be referred to during the consideration of the Planning Application relating to the Site.
- 5.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that applications for development must be determined in accordance with the development plan unless material considerations indicate otherwise. Such material considerations include the National Planning Policy Framework (NPPF) and other statements of national planning policy.
- 5.3 In addition, the National Planning Practice Guidance (NPPG) and Technical Housing Standards provide guidance at national level and are important material considerations in the determination planning applications. Each of these documents are reviewed in more detail below.

National Planning Policy Framework

- 5.4 The National Planning Policy Framework (NPPF) is the principal document against which to assess applications for development in respect of national policy objectives and was revised on 20 July 2021. At the heart of the NPPF remains the presumption in favour of sustainable development (paragraph 10).
- 5.5 The Proposals accord with the NPPF's overriding objective of delivering sustainable development, and this should be given considerable weight in determining the application. Paragraph 11 of the Framework advises that planning application decisions should apply a presumption in favour of sustainable development. Meaning they are in accord with up to date policy.
- 5.6 The NPPF considers sustainable development to have three dimensions: economic, social, and environmental. It confirms that the dimensions should be achieved jointly and simultaneously and where this is demonstrable, development should be approved without delay.
- 5.7 Chapter 4 'Decision Making' relates to decision making and states that local planning authorities should approach planning decisions in a positive and creative way, whilst also encouraging pre-application engagement to resolve issues early in the development of proposals. Additionally, it encourages Local Planning Authorities to work proactively with applicants to secure developments that will improve the economic, social, and environmental conditions of the area.
- 5.8 Chapter 5 'Delivering a Sufficient Supply of Homes' confirms that the Government is committed to boosting the supply of homes to meet local needs.

- 5.9 Chapter 8 ‘Promoting Healthy and Safe Communities’ states that planning decisions should plan positively for the provision and use of shared space, community facilities and other local services to enhance the sustainability of communities and residential environment.
- 5.10 Chapter 9 ‘Promoting Sustainable Transport’ directs new development to locations that are highly accessible by public transport, walking and cycling, recognising that an integrated transport system is necessary to support a strong and prosperous economy. The NPPF seeks to actively manage patterns of growth to focus significant development on locations which are or can be made sustainable, thereby reducing the need to travel.
- 5.11 Chapter 11 ‘Making Effective Use of Land’ relates to making effective use of the land. Paragraph 124 confirms that local authorities should support development that makes efficient use of land, considering identified need, local market conditions, the availability and capacity for infrastructure and services as well as the importance of securing well-designed, attractive, and healthy places.
- 5.12 Chapter 12 ‘Achieving Well-Designed Spaces’ states that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable developments, in terms of good functional and visually attractive design that is sympathetic to local character and history whilst allowing for appropriate innovation and change that optimises the sites potential.

National Planning Practice Guidance (NPPG)

- 5.13 The National Planning Practice Guidance was originally published online in March 2014 and is a web-based resource for all material relating to planning. The guidance and policies published here form a material consideration for any planning application decision. The NPPG is a “real-time” resource, within individual paragraphs, updated by the DLUHC⁴¹.

The London Plan (March 2021)

- 5.14 The London Plan was published in March 2021 and acts as the Spatial Development Strategy (SDS) for Greater London. As the overall strategic plan for the capital, it sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years.
- 5.15 Policy D2 concerns infrastructure requirements for sustainable densities stating that the density of a development proposal should consider and be linked to the provision of future planned levels of infrastructure and be proportioned to the site’s connectivity.
- 5.16 Policy D3 concerns optimising site capacity through the design-led approach by ensuring development is of the most appropriate form and land use for the site and ensuring consideration of design options to determine the most appropriate form of development that responds to a site’s context and capacity for growth. Higher density developments should be

⁴¹ Department of Levelling Up, Housing and Communities.

promoted in locations that are well connected to jobs, services, infrastructure, and amenities by public transport, walking and cycling.

- 5.17 Policy D4 concerns delivering good design stating that masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and place making. Design and access statements submitted with development proposals should demonstrate that the proposal meets the design requirements of the London Plan. The design quality of development should be retained through to completion by ensuring maximum detail is provided, wording of the planning permission provides clarity and avoiding deferring the assessment of design.
- 5.18 Development proposals referable to the mayor must have undergone at least one design review early on in their preparation before an application is made if they include a residential component exceeding 350 units per hectare; or propose a building defined as a tall building.
- 5.19 Policy D5 concerns inclusive design and states that development proposals should achieve the highest standards of accessible and inclusive design, that takes into account London's diverse population, provide high quality spaces with no disabling barriers, be able to be used with dignity for all. Design and Access Statements should include an inclusive design statement.
- 5.20 Policy D6 concerns housing quality and standards stating that housing development should be of high quality design and provide adequately-sized rooms and storage space, dwellings that are dual aspect should be prioritised that provide sufficient daylight and sunlight. The policy sets out minimum standards for private internal and outside space across all tenures.
- 5.21 Policy D8 concerns public realm and ensures the public realm is well-designed, safe, accessible, well connected, related to local context and easy to understand, service and maintain. The policy goes on to outline how public realm should function and include design elements that respond to context and need.
- 5.22 Policy D9 concerns tall buildings stating that development proposals should address visual impacts, special hierarchy, architectural quality, heritage assets, reflective glare, and light pollution. Functional impacts should be considered including access and servicing, as well as environmental impacts and cumulative impacts.
- 5.23 Policy H1 concerns increasing housing supply sets the ten-year targets for net housing completions that each local planning authority should plan for. The policy also states that Boroughs should encourage the development of appropriate windfall sites to help meet these targets. The London Borough of Richmond has a ten year target of 4,110 net additional homes in the period 2019/20 – 2028/29.
- 5.24 Policy H4 concerns delivering affordable housing, setting a strategic target for 50 per cent of all new major developments (10 or more units) delivered across London to be genuinely affordable. Affordable housing should be provided on site, and should only be provided off-site or as cash in lieu contribution in exceptional circumstances. To assist with this aim, the Mayor requires major developments to provide affordable housing through the "threshold

approach⁴²” This requires a minimum of 35% of housing to be delivered as on site affordable housing. A number of criteria are set out to enable a scheme to be eligible for a “Fast-Track” route, but this does not apply to Estate Redevelopment.

- 5.25 Policy H6 concerns affordable housing tenure. A minimum of 30 percent low-cost rented homes, as either London Affordable Rent or Social Rent, a minimum of 30 per cent intermediate products and the remaining 40 per cent to be determined by the borough.
- 5.26 The loss of existing Housing and Estate redevelopment is considered by Policy H8. Any “*loss of existing housing should be replaced by new housing at existing or higher densities with at least the equivalent level of overall floorspace.*” Part D of the policy also requires provision of an equivalent amount of affordable housing floorspace.
- 5.27 Policy H10 concerns housing size mix, stating that schemes should generally consist of a range of unit sizes that should be considered in regard to robust local evidence where available or the range of housing need and demand identified by the 2017 London Strategic Housing Market Assessment, the requirement to deliver mixed and inclusive neighbourhoods, the location of the site and the aim to optimise housing potential on sites.
- 5.28 Policy HC3 concerns strategic and local views, stating that strategic views help to define London strategic level, they are seen from places that are publicly-accessible and well-used. Boroughs should clearly identify local views in their Local Plans.
- 5.29 Policy G5 concerns Urban Greening, stating that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls, and nature-based sustainable drainage.
- 5.30 Policy G6 concerns biodiversity and access to nature, requiring development proposals to manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.
- 5.31 Policy SI1 concerns improving air quality. The policy ensures that development proposals do not lead to deterioration of existing air quality, as a minimum development proposal must be at least air quality neutral, utilise design solutions to prevent or minimise increased exposure to existing air pollution. Major developments should be submitted with an Air Quality Assessment. Development proposals must also reduce impacts on air quality during construction and demolition.
- 5.32 Policy SI2 concerns minimising greenhouse gas emissions, stating that major development should be net zero-carbon and should include a detailed energy strategy to demonstrate how this will be achieved. Major development should achieve a minimum of 35 per cent reduction beyond building regulations.

⁴² Policy H5, London Plan, GLA, Page 176

- 5.33 Policy SI13 concerns sustainable drainage, and states that development proposals should aim to achieve greenfield run-off rates. The policy defines the appropriate drainage hierarchy.
- 5.34 Policy T2 concerns healthy streets, stating the development proposals should deliver patterns of land use that facilitate residents making short, regular trips by walking or cycling. Proposals should be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport, dominance of vehicles should be reduced.
- 5.35 Policy T5 concerns cycling and ensures that development proposals help remove barriers to cycling through the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well located. Development should provide cycle parking at least in accordance with the minimum standards within the plan.
- 5.36 Policy T6 concerns car parking and states that car parking should be restricted in line with levels of existing and future public transport and connectivity. Adequate provision should also be made for efficient deliveries and servicing and emergency access.
- 5.37 Policy T6.1 concerns residential parking and defines maximum parking standards. All residential car parking spaces in communal spaces should be leased rather than sold and all should provide infrastructure for electric vehicles, at least 20% of spaces should have active provision and passive provision for remaining spaces. Disabled parking should be provided for new residential developments.

Richmond upon Thames Local Plan (2018)

- 5.38 The Richmond local plan was adopted in 2018. Whilst the plan was subject to two subsequent legal challenges which resulted in amendments to the plan, neither related to aspects of the plan relevant to Ham Close and are specific to the two sites involved⁴³. The amendments were adopted in 2020.
- 5.39 Early on in the plan, reference is made to the redevelopment of Ham Close as part of the Local Plan Strategic Vision. Under the sub-header “A Sustainable future”, it is stated that “residents will have access to a choice of new and improved homes in Ham Close⁴⁴”. Ham Close is considered to be a significant development area⁴⁵ and subject to site specific allocation (SA15).
- 5.40 The full text of Policy SA15 states:

“The Council supports the regeneration of Ham Close and will work in cooperation with Richmond Housing Partnership in order to rejuvenate Ham Close and its surrounding area. A comprehensive redevelopment of this site, including demolition of the existing buildings and new build re-provision of all residential and non-residential buildings, plus the provision of additional new residential accommodation, will be supported.”

⁴³ The two sites were St Michael’s Convent, Ham Common and Udeny Park Playing Fields, Teddington

⁴⁴ Page 10, Section 2, Adopted Richmond Local Plan, 2018.

⁴⁵ Paragraph 3.1.41, Page 20, Adopted Richmond Local Plan, 2018.

- 5.41 The allocation does not specify a quantum of development, instead seeking “*to optimise the use of the land*”. Development should also respond positively to the unique character of Ham Close and Ham.
- 5.42 Policy LP1 considers Local Character and Design Quality. The policy sets out the basis for assessing proposals. This includes, amongst other matters, the compatibility with local character; the approach to sustainable design and construction; making the best use of land; relationships with public realm; inclusive design and suitability and compatibility of uses.
- 5.43 Policy LP2 concerns Building Heights. Proposals that are taller than the surrounding townscape have to be of high architectural design and standards. They must also deliver public realm benefits and have a wholly positive impact on the character and quality of the area. Applications for buildings of scale must be a full (detailed) planning application as is stated. The supporting text makes the distinction between “tall” and “taller” buildings. The former being greater than 18 metres.
- 5.44 Policies LP3 and LP4 cover designated and non-designated heritage assets respectively. Great weight is given to the importance of heritage assets, and their settings in line with National and London Plan policies. The policies are supported by Policy LP5 on “Views and Vistas”, requiring proposals to demonstrate visual impacts of through Computer Generated Images (CGIs).
- 5.45 Archaeology is the subject of Policy LP7. The Council will seek to protect, enhance, and promote its archaeological heritage, requiring desk-based assessments and, where necessary, archaeological field evaluation.
- 5.46 Policy LP8 (Amenity and Living Conditions) makes reference to the importance of good standards of daylight and sunlight to be achieved through development. Other criteria include ensuring balconies do not lead to unacceptable overlooking or disturbance; avoid visual overbearance and ensure there is “*no harm to the reasonable enjoyment of the use of buildings*”. The Policy is supported by LP10 “Local Environmental Impacts”, which sets out requirements for Air Quality, Noise and Vibration, Light Pollution, Odours, Land Contamination and Construction & demolition.
- 5.47 Subterranean Developments and Basements are considered by Policy LP11. The Policy sets out six separate criteria for compliance. This includes “*providing 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*”.
- 5.48 Policy LP12 considers Green Infrastructure and sets out the Public Open Space hierarchy. The hierarchy ranges from Regional Parks (400ha+) to Pocket Parks (under 0.4ha) and Linear Open Spaces. LP13 protects Green Belt, Metropolitan Open Space and local Green Space from inappropriate development.
- 5.49 The Local plan also contains a specific policy (Policy LP14) relating to “Other Open Land of Townscape Importance” (OOLTI). The existing Ham Close buildings neighbour two areas of

OOLTI land to the west and east. The policy seeks to protect such land, but recognises that *“there may be exceptional cases where appropriate development is acceptable”*. There are three criteria for such development. These are: a. it must be linked to the functional use of the Other Open Land of Townscape Importance; or b. it can only be a replacement of, or minor extension to, existing built facilities; and c. it does not harm the character or openness of the open land. Policy LP14 also states that Measures to open up views into or out of designated other open land will be encouraged.

- 5.50 Policies LP15 and LP16 consider Biodiversity and Trees respectively. Biodiversity enhancements will be supported and the provision of soft landscaping should be maximised. The Council will resist the loss of trees, seeking an appropriate replacement of any tree felled. Contributions will be sought using the “Capital Asset Value for Amenity Trees” (CAVAT) of offsite provision and trees should be protected throughout the course of development in accordance with British Standard 5837.
- 5.51 Policy LP17 states that Green roofs and/or brown roofs should be incorporated into new major developments. The aim is to utilise at least 70% of any potential roof plate. Policy LP20 promotes Climate Change adaptation through development, whilst Policy LP21 on Flood Risk and Sustainable Drainage provides a matrix of land uses and requirements. There are no land use restrictions in Flood Zone 1. Similarly, the matrix states that there are “no restrictions” on new basements in Flood Zone 1.
- 5.52 Policy LP22, sets out a number of standards for Sustainable Design and Construction. This includes a maximum water consumption of 110litres of water per person per day together with achieving a BREEAM⁴⁶ standard of Excellent for Non-residential buildings over 100m². The policy also seeks a 35% reduction in CO₂ emissions (expressed as percentage improvement over target emission rate (TER) based on Part L of the 2013 Building Regulations).
- 5.53 Policy LP23 regarding Water Resources requires adequate water and sewage capacity to support development. Meanwhile Policy LP24 concerns Waste Management. This includes ensuring suitable provision is made for the operational use of the buildings, but also seeking to maximise opportunities for waste recycling through the construction process.
- 5.54 Local Plan Policy LP28 sets out the requirements for Social and Community Infrastructure. The policy supports new (or extensions to) existing community infrastructure where it meets a local need, is of high quality and inclusive design and is capable of being multi-use.
- 5.55 A Health Impact Assessment is required for all major developments under Policy LP30 (Health and Wellbeing). The policy also states that the Council will support green infrastructure and attractive walking routes. The policy also encourages access to local community facilities and social interaction together with access to local growing spaces. This aspect of the policy coincides with Policy LP32 (Allotments and Growing Spaces).

⁴⁶ Building Research Establishment Environmental Assessment Method

- 5.56 Policy LP31 considers Public Open Space, Play Space, Sport and Recreation. An assessment of such facilities is required to assess the impact of development on existing Public Open Space. Play Space requirements should also be calculated in line with the London Plan Benchmark of 10m² per child.
- 5.57 Policy LP34 sets out the Boroughs target for 3,150 homes for the period 2015 – 2025. The policy also states that it will exceed this minimum target.
- 5.58 Policy LP35 states that Housing mix should be appropriate to the site-specifics of the location, and that all new housing development are required to comply with the Nationally Described Space Standards. Balconies and terraces are encouraged on upper floors. The Policy also states that 90% of all new build housing is to meet Building regulations standard M4(2) and 10% M4(3).
- 5.59 Adopted Policy LP36 (Affordable Housing) states that the Council expects; *“50% of all housing units will be affordable housing, this 50% will comprise a mix of 40% of the affordable housing for rent and 10% of the affordable housing for affordable intermediate housing.”* The policy also states that the affordable housing mix should be based on engagement with a Registered Provider. In line with both National and London Policy, the policy acknowledges that this requirement may not always be achievable. In such circumstances, the Council will seek to secure the maximum reasonable amount of affordable housing with regard to *“a. economic viability; b. individual site costs; c. the availability of public subsidy; and d. the overall mix of uses and other planning benefits.”* Under Policy LP36 the developer is required to produce a viability assessment and underwrite the Councils costs to rigorously evaluate the proposals.
- 5.60 Policy LP38 concerns the “loss of housing”. It should be noted that the supporting text is clear that the policy is aimed at *“individual smaller sites, rather than large scale remodelling⁴⁷”*, but nonetheless supports redevelopment to provide a reasonable standard of accommodation after a proven case that the existing housing cannot be improved satisfactorily and there is not an adverse impact on local character.
- 5.61 Policy LP44 encourages Sustainable Travel Choices, whilst Policy LP45 sets out the borough’s Parking Standards. Front garden parking requires demonstration that there is no material impact on safety, and would not be harmful on the character of the area.

Ham & Petersham Neighbourhood Plan (2018-2033)

- 5.62 The Ham and Petersham Neighbourhood Plan (H&PNP) was adopted in January 2019. The plan acknowledges there are “few key opportunity areas for housing development in the area”, and that significant development outside these sites would likely involve building on Metropolitan Open Land”. Ham Close is identified as a Key Opportunity Site.

⁴⁷ Paragraph 9.5.2 Richmond Local Plan, 2018.

- 5.63 The neighbourhood plan seeks a “strategic balance” of 20% affordable housing of the housing stock should be sought through site negotiations for the Ham and Petersham Neighbourhood Area⁴⁸.
- 5.64 Policy H2 references housing design. In addition to requiring high quality design and a landscaping strategy that enriches the biodiversity of the area, the policy also contains guidance on scale. Of particular relevance to Ham Close is that *“Developments over 4 storeys will be considered acceptable if the proposal demonstrates positive benefits in terms of the townscape and local aesthetic quality and relate well to their local context”⁴⁹.*
- 5.65 Policy C1 titled “Protecting Green Character”, seeks to retain the clear distinction between the built-up areas and green spaces, and ensure leisure facilities have regard to the semi-rural setting with appropriate materials.
- 5.66 Policy C2 meanwhile asks that applications for new buildings demonstrate *“how the proposal addresses the key elements of the designated Conservation Area or neighbourhood character area in which the site is located”*. Cross reference is made to Appendix 4 of the Plan which contains the character and context study. Ham Close is not in a Conservation Area, but is subject to a Character Area Study⁵⁰.
- 5.67 Ham Close is within the “Central Ham” area of the H&PNP. The authors consider that *“Ham Youth Centre is a rather bleak and forbidding building with a large car park”⁵¹* and that the shops and flats at the junction of Ham street and Ashburnham Road suffer from a *“poor environment”⁵²*. Policy O3 (Ham Close) asks that the redevelopment has regard to the Ham Close Character Study. The policy also requires an equivalent replacement for the redevelopment of Community Facilities.
- 5.68 The document also puts forward a Community Proposal for Ham Village Green (No 5), seeking ongoing enhancement and appropriate play and exercise equipment. The plan states that *“The significance of this open space is likely to be enhanced if Ham Close is redeveloped”⁵³*
- 5.69 The Appended Ham Close Character Study makes particular note of the strong sense of community. The same study remarks that *“Although at first glance Ham Close seems at odds with the area, and some would consider the design and layout as typical of rather insensitively designed ‘Council Housing’, locally it is accepted as an integral part of Ham, contributing to the social mix and variety of accommodation”⁵⁴.*

Supplementary Planning Guidance

- 5.70 Other policy documents that are material to the consideration and determination of this planning application include Supplementary Planning Guidance (SPGs), Supplementary

⁴⁸ Paragraph 3.2.5, Ham Close, Ham and Petersham Neighbourhood Plan 2019

⁴⁹ Policy H2 (B2) – Design Principles of Housing Development, Ham and Petersham Neighbourhood Plan 2019

⁵⁰ Page 118 Character Area 6 – Ham Close, Ham and Petersham Neighbourhood Plan 2019.

⁵¹ Paragraph 9.10.3 of the Ham and Petersham Neighbourhood Plan 2019.

⁵² Paragraph 9.10.4 of the Ham and Petersham Neighbourhood Plan 2019.

⁵³ Paragraph 9.13.3 of the Ham and Petersham Neighbourhood Plan 2019.

⁵⁴ Page 132 Character Area 6 – Ham Close, Ham and Petersham Neighbourhood Plan 2019.

Planning Documents (SPDs) and London Plan Guidance (LPG) prepared by the Greater London Authority (GLA) and the Council. These have been taken into consideration throughout the development of the proposal.

London Plan Supplementary Planning Guidance and London Planning Guidance (LPG)

5.71 A number of supplementary planning documents have been published by the Mayor of London. Whilst initially authored to be supplementary to previous versions of the London plan, the content and best practice guidance of many of the documents remain relevant. The following London Plan Supplementary Planning Guidance (SPG) have been considered as part of the development:

- Accessible London Plan (2011);
- Planning for Equality & Diversity SPG (2007)
- Character and Context SPG (2014)
- Housing SPG (2016)
- Play & Informal Recreation SPG (2012)
- Social Infrastructure SPG (2015)
- The Control of Dust and Emissions SPG (2014)

5.72 In addition to the above SPG, more recent draft guidance has been released with reference to the 2021 London Plan. These documents are referred to as London Plan Guidance (LPG) and include:

- Fire Safety (2022)*
- Characterisation and Growth Strategy LPG (2022)
- Housing Design Standards LPG (2022)*
- Optimising Site Capacity: A design-led approach LPG (2022)*
- Urban Greening Factor LPG (2021)*
- Whole Life Carbon LPG (2022)
- Air Quality Neutral LPG (2022)*
- Air Quality Positive LPG (2021)*
- Be Seen Energy Monitoring LPG (2021)
- Circular Economy Statements LPG (2022)
- Sustainable Transport: Walking & Cycling LPG (2021).

5.73 Those LPGs listed above, but marked with an asterisk have been issued in draft. The LPGs have not yet been formally adopted.

Estate Regeneration : Good Practice Guide

5.74 In February 2018, the Mayor of London published “Better Homes for local People : The Mayors Good Practice Guide to Estate Regeneration”. Defining what makes successful estate regeneration is clearly set out in the introduction to the document.

“When undertaken successfully, estate regeneration can bring genuine benefits to Londoners, with better homes for local people living on the estate, more homes of all tenures, improvements to neighbourhoods, new opportunities for training and employment, and new community facilities⁵⁵.”

5.75 In addition to re-affirming the need for full and transparent consultation and involvement with residents, the guide also sets out three key principles for Estate Regeneration. Namely; i) An increase in affordable housing. ii) Full rights to return or remain for social tenants and iii) a fair deal for leaseholders and freeholders.

Richmond Supplementary Planning Documents (SPD)

5.76 The following SPD have been considered as part of the Ham Close proposals:

- Air Quality (2020)
- Affordable Housing (2014 with 2021 Update)
- Buildings of Townscape Merit (2015)
- Design Quality (2006)
- Noise Generating & Sensitive Development (2018)
- Planning Obligations 2020
- Refuse & Recycling Storage Requirements (2015)
- Residential Development Standards (2010)
- Sustainable Construction Checklist (2016)
- Transport (2020)

Good Practice Guides and other relevant Planning Documentation

5.77 In addition to the above, LBRuT have also produced a Good Practice Guide on Basement developments (2015). Whilst primarily aimed at domestic basement extensions and

⁵⁵ Page 4, Better Homes for local People : The Mayors Good Practice Guide to Estate Regeneration, Mayor of London, 2018.

neighbourly matters, the document has been considered alongside the “Basement User Guide” (2021) by LBRuT and metis consultants as part of the design development process.

- 5.78 “Delivering SuDS” in Richmond Planning Guidance (2015). Construction Management Plan Guidance notes (2021) and “Accessible and Inclusive Housing for the London Boroughs of Richmond and Wandsworth” (2020) have all been appraised as part of the planning analysis.

Emerging Local Plan

- 5.79 On the 10 December 2021, the *Richmond Local Plan ‘The best for our borough’ draft for consultation* was released. The consultation ran until the 31 January 2022. It has the status of a Pre-Publication Regulation 18 Draft. At the time of this planning statement, LBRuT are assimilating representations made during the consultation. This includes representations made by Hill Residential.

- 5.80 Given its early stage, limited weight can be attached to the document in the determination of planning applications. Nonetheless, Ham Close continues to be allocated for redevelopment in the emerging local plan (Site Allocation 22). In the allocation text it is stated that;

“The Council supports the regeneration of Ham Close in cooperation with Richmond Housing Partnership in order to rejuvenate Ham Close and the surrounding area. A comprehensive redevelopment of this site including demolition of the existing buildings and new build re-provision of all the residential and non-residential buildings, plus the provision of additional new residential accommodation with affordable housing at policy compliant levels, will be supported.”

- 5.81 The allocation also references the Councils Urban Design Study 2021, which “*identifies Ham Close as mid-rise building zone (5-6 storeys)*”

6. Planning Assessment

Introduction

6.1 This section assesses the planning application against National, Regional (London) and Local (London Borough of Richmond upon Thames) Planning Guidance as set out in the previous chapter. This details how the proposals accord with planning policies, as set out under the following sections.

- Principle of Development
- Estate Regeneration
- Affordable Housing
- Scale
- Housing Quality
- Landscape & Amenity
- Natural Environment
- Community Centre & MakerLabs
- Transport, Highways & Basement
- Heritage & Townscape
- Sustainability

The Principle of Development

6.2 The redevelopment of Ham Close has been a long-standing aspiration of the Community and the Council for over a decade. Ham Close is identified for redevelopment in both the adopted Richmond Local Plan and the Ham & Petersham Neighbourhood Plan. It is also subject to an allocation in the Emerging Local Plan⁵⁶.

6.3 The local plan strategic vision identifies “*new and improved homes in Ham Close*” as part of the borough’s commitment to sustainable growth⁵⁷. Ham Close is considered to be a “key development site”⁵⁸.

6.4 The adopted local plan includes a site allocation for Ham Close (SA15). The allocation states:

“The Council supports the regeneration of Ham Close and will work in cooperation with Richmond Housing Partnership in order to rejuvenate Ham Close and its surrounding area.

Comprehensive redevelopment of this site, including demolition of the existing buildings and new build re-provision of all residential and non-residential buildings, plus the provision of additional new residential accommodation, will be supported.” (Adopted Local Plan, Page 161)

⁵⁶ Regulation 18 Draft.

⁵⁷ Page 10, The Local Plan Strategic Vision, Section 2 A Sustainable Future, Adopted Richmond Local Plan 2018.

⁵⁸ Paragraph 3.1.8, Page 16, Adopted Richmond Local Plan 2018.

- 6.5 The supporting text to the allocation acknowledges the poor construction of the flats and inherent problems of the buildings. It is clear from the allocation that there is an expectation that the Site will be comprehensively redeveloped rather than refurbished. Furthermore, the allocation supports additional residential on the Site.
- 6.6 The need for redevelopment should also be set against the context of the wider housing crisis, which is particularly acute in London and the South East.
- 6.7 Richmond upon Thames has a minimum ten-year net housing target of 4,110 homes⁵⁹. Accommodating this target will mean delivering homes on allocated sites, such as Ham Close during the plan period. The availability of alternative land for housing development is limited, as recognised by the Council’s Homeless Strategy:

“LBRuT is a unique borough in that more than two thirds of it is protected by either Open Land or Conservation designations meaning that development is often focused on smaller sites. New development proposals are therefore constrained by planning policies which seek to retain the Borough’s distinctive character. In addition, land availability for residential development is further constrained by high existing use values.” (P25, Housing & Homelessness Strategy 2021-2026)

- 6.8 Redevelopment of Ham Close will make a meaningful contribution towards the Council’s Housing targets.

Estate Regeneration

- 6.9 Adopting the Principles of the Better Homes for Local People – The Mayor’s Good Practice Guide to Estate Regeneration; RHP and Hill are committed to:

- an increase in affordable housing;
- full rights to return or remain for social tenants; and
- a fair deal for leaseholders and freeholders

- 6.10 These regeneration proposals accord with all three principles, and this section explains the approach to each.

An Increase in Affordable Housing

- 6.11 There are 192 homes at Ham Close. Of these 143 are considered to be affordable. This consists of 132 RHP tenants, and 11 short term lets. The remainder of the homes are leaseholder properties acquired under right to buy and therefore considered to be private for the purposes of the planning application.

- 6.12 There will be an increase in affordable housing through redevelopment. This increase applies to all metrics. There will be an increase in affordable floorspace; the number of affordable habitable rooms; and the overall number of affordable homes – both rented and intermediate.

⁵⁹ Adopted London Plan Table 4.1 10 year housing targets for net housing completions (2019/20 – 2028/29).

Full rights to return or remain for social tenants

- 6.13 As described in Section 3 of this document and in the Statement of Community Involvement (SCI), the regeneration of Ham Close has been subject to substantial resident engagement. RHP Tenants have been at the heart of discussions throughout and helped set the principles upon which Hill were chosen as development partner. This has included consideration of the masterplan approach, but also practical issues relating to re-housing. Each Leaseholder and RHP tenant is able to access the agreed principles of the “Customer Offer”, referenced in Section 3 and detailed on the RHP website⁶⁰.
- 6.14 With exception of the enabling first phase of Hatch House, The Customer Offer is for tenanted residents to remain at Ham Close ahead of being offered a new home. RHP residents are not “*leaving and returning*” but instead making a single move to their new home. To achieve this, the phasing of the scheme has had to be sensitively considered from the outset.
- 6.15 Notwithstanding this, Hatch House represents the beginning of the redevelopment. Without the construction of any new homes having been completed on the estate, it will be necessary to ‘*decant*’ tenants in this block to enable the development. RHP tenants at Hatch House are subject to a formal consultation on their re-housing - either on or off Ham Close. Whilst some residents may choose to relocate permanently to a new home beyond Ham Close, RHP’s current approach is to continue to provide Hatch House tenants a Right to Return regardless of stated customer desire at the present time.
- 6.16 RHP and Hill have sought to ensure disruption is minimised and the vibrant existing community remains on Ham Close rather than dispersed to other locations by the regeneration proposals.

Matching Homes to Tenants

- 6.17 The Customer Offer promises tenanted customers in studios a more generous 1 bedroom home as a minimum offer and those already in 1, 2 & 3 bedroom homes the right to a similar sized property.
- 6.18 It is recognised that Housing requirements can change over time, and household sizes will remain fluid between planning permission and the actual move. It is acknowledged that any assessment of need is a “snap shot” in time.
- 6.19 To avoid under-occupying, downsizing will be supported where sought, and any requests for upsizing will follow the normal application process and housing need assessed at the time of their offer. It is on this basis that the proposed replacement mix of homes is considered appropriate.
- 6.20 Following the grant of planning permission, there will be further consultation with residents ahead of any move. To ensure the needs assessment is kept up to date, for some there may be 4.5 years before they are assessed for their offer if they are moving to construction phase 2.

⁶⁰ [Residents | hamclose](#)

Rents

- 6.21 Existing RHP residents will all be offered the same rental terms as existing. Social Rents will continue to apply where they are currently charged. The rent figure is likely to increase with to reflect the increase in size and value but the rent setting methodology will remain the same.

A fair deal for leaseholders

- 6.22 Homeowners (Resident or non-Resident Leaseholders) who want to move from Ham Close by negotiated agreement have also been provided with a “Customer Offer”.
- 6.23 The offer consists of full Market Value for their home, plus 10% of that value and disbursements. This offer is available to all Homeowners, whether they live at Ham Close as their main home or rent out the property.
- 6.24 Disbursements cover items such as removal costs, conveyancing fees (for the sale of their home at Ham Close and also the cost if you buy a replacement home) and Stamp Duty on their replacement property (up to the value of the home that is being sold at Ham Close) plus other relevant costs associated with moving.
- 6.25 To ensure full transparency the “Customer Offer” is publicly available to view on the Ham Close website (www.hamclose.co.uk/residents). All leaseholders are able to have a no-commitment independent valuation from a Royal Institute of Chartered Surveyors (RICS) valuer to inform their decision. The valuation is free, and if the customer does not agree with the offer being made, there is no obligation to accept. They are able to sell their home on the open market via an Estate Agent in the usual way.
- 6.26 TPAS (Tenant Participation Advisory Service) reviewed the Customer Offer in October 2017 and found that it met, and in many respects positively exceeded, the legal requirements. TPAS will continue to advocate on behalf of tenants and leaseholders throughout the regeneration.
- 6.27 A number of homeowners have contracted with RHP since December 2019, and RHP have completed the buy-back on a number of homes (20).

Leaseholders wishing to Return

- 6.28 Some homeowners haven’t yet decided whether they would like to sell their home and move from Ham Close or purchase one of the new homes at the redeveloped Ham Close. The RHP Customer Offer promises to offer a new home for returning leaseholders with the same number of bedrooms as they currently have, with the opportunity for them to be purchased on a Shared Equity basis if required.
- 6.29 For the purposes of planning, these homes are regarded as Market Housing rather than Affordable housing. This is to avoid mis-characterising properties that may not be taken up on a shared equity basis or be utilised by occupants who do not qualify for affordable housing.

Leaseholders not wishing to participate

- 6.30 In order to ensure the regeneration can move forward in the event of leaseholders not wishing to partake in the Customer Offer, RHP have approached Richmond Council for clarification on

the use of their Compulsory Purchase Order (CPO) powers. This would enable RHP to secure vacant possession in such circumstances (and subject to planning).

- 6.31 Richmond Council have confirmed their ‘in principle’ agreement to use their CPO powers subject to a number of conditions. However, CPO is a last resort to preserve the wider regeneration benefits for the Ham Close community.

Affordable Housing

Amount

- 6.32 221 of the 452 homes will be affordable. The proposals will deliver 49% affordable housing on a unit basis. This is marginally below the adopted local plan target⁶¹ of 50%. However, in line with National and London Plan Policies, it is recognised that this target is subject to viability. Part C of the policy explains that regard will be had to economic viability, site costs, public subsidy, overall mix and other planning benefits when negotiating the maximum reasonable amount of affordable housing.
- 6.33 The application is supported by a viability appraisal by DS2 in accordance with Part D of the policy.
- 6.34 The most recent data from the Richmond Annual Monitoring Report⁶² shows that there were 34 Affordable Housing Completions in 2019/20. This represented 10% of the overall number of homes completed. The overall ten-year average⁶³ is 20%.
- 6.35 It should be noted that the estate redevelopment programme does not simply replace “*an equivalent amount of affordable housing floorspace*”⁶⁴ but notably increases it, both in the size of individual homes, but also in the overall floorspace across Ham Close. A breakdown is provided below:

Measure	Affordable Existing	Affordable Proposed	Difference
Floorspace (NIA)	7,027 m ²	13,652 m ²	+6,625 m ²
Floorspace (GIA)	8,905 m ²	18,683 m ²	+9,778 m ²
Homes	143	221	+78
Habitable Rooms	441	551	+110

Table 7: Existing vs Proposed Affordable Housing

⁶¹ Policy LP36 (Affordable Housing), Adopted Richmond Local Plan, 2018 as amended.

⁶² See Page 12, Table 6: Affordable Housing Completions by Financial Year, Richmond Annual Monitoring Report, 16 November 2020

⁶³ For the Period 2005/06 – 2019/20 (1,143 homes out of 5,837 homes were affordable).

⁶⁴ Policy H8 (D) (Loss of existing housing and estate redevelopment), London Plan 2021, p185.

Tenure Split

- 6.36 Adopted Policy LP36 (Affordable Housing) states that “a. 50% of all housing units will be affordable housing, this 50% will comprise a mix of 40% of the affordable housing for rent and 10% of the affordable housing for affordable intermediate housing. “.
- 6.37 Emerging Policy seeks a gross provision of 50% with a tenure split of 70% affordable rented and 30% intermediate⁶⁵. The distinction being that emerging policy measures affordable housing in habitable rooms rather than homes, and a greater proportion of intermediate housing.
- 6.38 It should also be noted that the latest Local Housing Needs Assessment for the Council⁶⁶ states that nearly 70% of affordable Housing should be for rented, with 30% for intermediate⁶⁷.

Affordable Rented	Net Need (p.a.)
Affordable/Social Rented (p.a.)	1,123
Proportion (%)	67%
Affordable Home Ownership (p.a.)	552
Proportion (%)	33%
Total (p.a.)	1,675

Figure 8: Excerpt from Local Housing Needs Study: LBRuT & Icen Dec 2021

- 6.39 Part C of adopted policy LP 36 acknowledges that on individual schemes, regard will be had to economic viability, site costs, public subsidy, overall mix and other planning benefits when negotiating the maximum reasonable amount of affordable housing.
- 6.40 Of the 221 affordable homes being provided, 164 are rented, and 57 are intermediate. This equates to 74% rent and 26% intermediate. The tenure split therefore deviates slightly from the 80/20 (or 40/10) breakdown specified in the adopted plan but ensures that nearly three quarters of affordable homes are rented.
- 6.41 The tenure split has a higher proportion of affordable rented homes than that specified in the emerging local plan, and the most up to date needs assessment that forms part of its evidence base.

Family Accommodation

- 6.42 Local Plan Policy LP 35 requires that “A. Development should generally provide family sized accommodation, except within the five main centres and Areas of Mixed Use where a higher proportion of small units would be appropriate. The housing mix should be appropriate to the site-specifics of the location.”. The Site provides family sized accommodation and has been

⁶⁵ Draft Policy 11, Affordable Housing (Strategic Policy) , Regulation 18 draft.

⁶⁶ Local Housing Needs Assessment, December 2021, Commissioned by LBRuT, Icen.

⁶⁷ Paragraph 9.10

designed to fit with local housing requirements, in particular the needs of residents of Ham Close itself.

6.43 The following chart compares the breakdown of the existing mix vs the proposed mix. Where the bar is split equally (50%) the same number of homes of that type are re-provided. A dominance of one colour shows a greater amount of the properties compared to the other. For example, there are currently 48 studio flats vs 4 studio flats proposed.

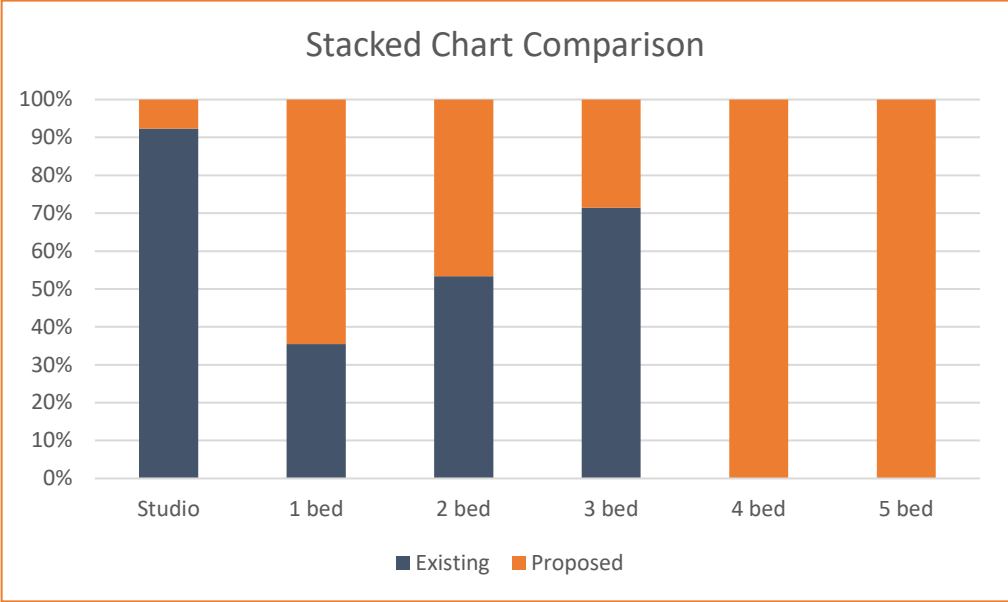


Figure 9: Comparison Stacked Graph Existing vs Proposed (All Tenures)

- 6.44 The Local Housing Needs Assessment for the Council provides a guide on housing mix for the borough. This is set out below. Notwithstanding this, the study’s authors, Icen, stress that a flexible approach should be taken to individual development sites. This statement is particularly important in regard to Estate Regeneration schemes, such as Ham Close.
- 6.45 It should also be recognised that the first step on the home ownership ladder is rarely for a large property, and that income thresholds for eligibility would typically preclude large intermediate homes of more than 3 bedrooms in London.
- 6.46 In terms of Affordable Rent, a significant element of the proposed rental accommodation is dictated by the current housing needs of residents at Ham Close. To avoid under-occupying, and the associated costs for residents in doing so, it is critical to correctly match new homes against local need. Here, RHP have undertaken 1:1 interviews with the majority of residents and assessed their requirements.
- 6.47 The following re-provision of 172 homes is required for renting tenants and leaseholders in any redevelopment. It is noteworthy that the most significant requirement for rented accommodation is 1 bedroom homes (92), followed by two bedroom homes (38).
- 6.48 For the avoidance of doubt, Studios are not being re-provided in the affordable rented re-provision. Instead, their requirements have been classified as self-contained 1 bedroom.

	1 Bed	2 Bed	3 Bed	4 Bed	Total
Reprovision Requirement (Rent)	92	38	13	0	143
Reprovision Requirement (Leaseholder)	8 ⁶⁸	18	3	0	29
Total	100	56	16	0	172

Table 8: Reprovision Requirements

	1 Bed	2 Beds	3 Beds	4+Beds
Market	41%	40%	6%	13%
Affordable Ownership	51%	47%	2%	0%
Affordable Rented	60%	30%	10%	0%
LESS EXISTING REPROVISION REQUIREMENTS				
Market	43%	37%	6%	15%
Affordable Ownership	51%	47%	2%	0%
Affordable Rent	33%	52%	14%	0%

Table 9: Percentage Mix and Residual Percentage Mix after Reprovision.

- 6.49 The above analysis shows that the additional homes above the reprovision are more closely aligned to wider borough needs than if viewed in isolation.
- 6.50 Whilst a prescriptive adherence to the borough wide policy ranges would require a greater amount of 3 and 4 bedroom homes in all tenures it is considered that taking into account the availability of public subsidy, economic viability and the need for housing of all types in the borough – the optimum housing mix is provided.

Tenure Distribution

- 6.51 The redevelopment of Ham Close will be tenure blind⁶⁹. Affordable blocks will be indistinguishable from Private Blocks in design quality. Communal amenity space and playspace is shared by all.
- 6.52 The delivery of affordable housing is prioritised over new market housing. Indeed, the majority of market housing will not be delivered until the final phase of development. This ensures existing residents are at the forefront of the regeneration and can be re-housed

⁶⁸ Includes two studio flats

⁶⁹ As required in adopted local plan para 9.3.3 and emerging LBRUT Local Plan Regulation 18, Para 17.26 and Draft Policy 44.

expediently, with the aim of a single move on-site. It also ensures that the affordable housing quality design sets a high bar to support the sales of the market homes that will follow.

Height and Massing

- 6.53 Current buildings on the site predominantly consist of 4 and 5 storey residential blocks. The dispersed layout of these blocks do not have a coherent focal point or interface with surrounding streets.



Figure 10: View of Blocks towards Woodville Road (Google 2022)

- 6.54 The local plan is clear that tall buildings are ‘likely to be inappropriate’ in Ham. The adopted Richmond local plan defines tall buildings as exceeding 6 storeys (18 metres)⁷⁰ whilst the emerging plan considers the threshold of a tall building to be 7 storeys or more (21 metres)⁷¹. Meanwhile, the Ham and Petersham Neighbourhood plan states that ‘*Developments over 4 storeys will be considered acceptable if the proposal demonstrates positive benefits in terms of the townscape and local aesthetic quality and relate well to their local context.*’⁷²
- 6.55 The Council’s recent Urban Design Study identifies Ham Close as a “Mid-Rise building zone”, with appropriate heights of 5- 6 storeys (15-18m)⁷³. It is the only site in the Ham, Petersham and Richmond Park Area deemed suitable for such scale. This evidence base is also taken forward in the emerging local plan and referenced in emerging Site Allocation 22.

⁷⁰ See supporting text to Policy LP2 Building Heights, Adopted London Borough of Richmond Local Plan 2020.

⁷¹ Policy 45 : Tall and Mid-Rise Building Zones.

⁷² Policy H2 of the Ham and Petersham Neighbourhood Plan.

⁷³ Page 253, Section E, Urban Design Study , 9 December 2021, Arup for LBRuT.

- 6.56 It should be noted that any sixth storey is a set-back top floor, and therefore not visually prominent. To ensure adequate floor to ceiling heights, and the provision of appropriately deep biodiverse roofs with associated parapets on these buildings, the maximum height reaches a maximum 19.875 metres rather than 18 metres calculated for six storeys. However, a lower parapet would be less attractive and lower floor to ceiling heights would have a lower housing quality. The difference of the additional 1.8 metre on the set back storey is imperceptible from both short and long range views.
- 6.57 The proposals are not considered to be a “higher density residential development” against London Plan standards⁷⁴.
- 6.58 The proposed heights and density therefore accord with both adopted and emerging planning policy on scale.

Housing Quality

- 6.59 The scheme design has been developed through workshops with residents, officers at Richmond Council, The Greater London Authority and the Richmond Design Panel.
- 6.60 There will be a notable improvement in the conditions of residents resulting from the proposals. Homes will be brought up to National Space Standards⁷⁵, with all homes becoming more spacious than their current property. This is illustrated in the comparison overleaf.

		NDSS Standard M ²	Existing Average M ²	Proposed Average M ²	Difference (Existing v Proposed) M ²
Flats	Studio	39 (37)*	31.9	39.8	+7.9
	1 Bed	50	45.1	50.9	+5.8
	2 Bed 4p	70	64.2	71.9	+7.7
	3 Bed 5p	86	72.7	88.5	+15.7
	3 Bed 6p	90	78.7	99.0	+20.3
Houses (3 Storey)	4 Bed 7p	121	N/A	162.3	N/A
	4 bed 8p	130	N/A	172.4	N/A

⁷⁴ “Higher density residential developments are those with a density of at least 350 units per hectare” see footnote 28, Page 120 of London Plan 2021. The Ham Close proposals have a density of 96 units per hectare.

⁷⁵ Nationally Described Space Standards, DLUHC 2015.

	5 Bed 9p	134 ⁷⁶	N/A	211.4	N/A
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Table 10: Existing vs Proposed Areas of Homes (GIA)

6.61 In addition to increased floor areas, the homes are laid out in accordance with London Plan Standards⁷⁷. These include (but not limited to) the appropriate amount of built-in storage areas, minimum floor to ceiling heights of 2.5 metres and bedroom sizes. The internal arrangement of each of flat and house is detailed in the accompanying Design & Access Statement by BPTW.

Access

6.62 The existing homes at Ham Close do not meet modern accessibility standards. There are no dedicated homes for wheelchair users. Homes are under-sized against general national standards. There are no lifts within any of the buildings. There are also no dedicated wheelchair parking spaces on the Site.

6.63 The proposals are built to ensure 90% of Homes meet M4(2) and 10% meet M4(3) in accordance with the London Plan⁷⁸ and emerging policy⁷⁹. The scheme has also been designed in accordance with the Accessible and Inclusive Housing design brief⁸⁰.

6.64 Following these principles, the rental wheelchair homes will be ‘accessible’ from the outset. This includes amongst other facilities, an installed level access shower and fully accessible kitchen.

6.65 The proposed landscaping throughout the Site has all been designed for wheelchair users. The Linear Park is a level surface, with appropriate pathways for wheelchair use. Wheelchair dwellings are included in all tenures.

Aspect

6.66 Buildings and flat layouts have been configured to maximise access to light and ensure adequate ventilation. 376 out of the 452 homes will either be dual or triple aspect flats (83%).

Design

6.67 In contrast to the existing buildings on Ham Close, the proposed design will introduce a number of high quality and aesthetically pleasing buildings to the area. The design of the buildings has been subject to substantial design scrutiny⁸¹, including from the Richmond Design Review Panel (RDRP) as part of the pre-application process⁸².

Appearance

⁷⁶ No Area specified for 5 Bedroom 9 Person in Guidance. Area for 5 Bed 8 person 3 storey house used.

⁷⁷ Policy D6, Housing Quality and Standards.

⁷⁸ Policy D7, (Accessible Dwellings)

⁷⁹ Policy 13 Housing Mix and Standards, LBRuT, Regulation 18 Draft, 2022.

⁸⁰ Accessible and Inclusive Housing, Pt 2 Wheelchair Housing Site Brief, August 2020, LBRuT and Wandsworth.

⁸¹ Policy D4 Delivering Good Design, London Plan 2021.

⁸² Richmond Design Review Panel Meetings on 20 September 2021 and 12 January 2022.

- 6.68 Ham has an eclectic mix of buildings from different periods, ranging from the grand splendour of Ham House built in 1610 to the Modernist Parkley’s development of 1954. As part of the design development, extensive work was undertaken to assess the local vernacular to create a bespoke development for Ham that referenced its rich history⁸³.
- 6.69 The palette of materials include Red brick, Buff brick, White brick and the local Richmond Stock Blend. The palette of materials has been carefully considered to be purposefully subdued when viewed at long range distance whilst offering a richer, lively grain and texture when viewed locally.
- 6.70 The use of brick is purposeful for aesthetic reasons. However, it also provides a robustness to the development, and is low maintenance. The longevity of brick will ensure the design quality endures and minimises costs to residents over time.



Figure 11: Illustrative view of buildings around Linear Park. BPTW, 2022.

Landscape & Amenity

Amenity Space

- 6.71 Presently the existing homes do not have access to a balcony or terrace. All outside amenity space is reliant on the public shared green spaces around the base of the buildings and Ham Village Green.
- 6.72 In contrast, all homes in the Proposed Development will have access to a private garden or balcony in accordance with the local plan⁸⁴. The minimum London Plan requirements⁸⁵ are substantially exceeded. The total amount of private amenity area proposed including balconies is 6,568sqm.

⁸³ See BPTW Design and Access Statement, Section 2.2.

⁸⁴ Policy LP35 (C) , Page 110, LBRuT Adopted Local Plan, 2018

⁸⁵ Policy D6 (9) Private Outside Amenity Space, p126, London Plan 2021.

Play Space

- 6.73 There is currently no dedicated play space at Ham Close. Instead, the existing 192 homes rely upon the play space on Ham Village Green. Whilst the Site has easy access to substantial recreational space in the immediate vicinity, the proposals nonetheless seek to incorporate dedicated play space in line with Local⁸⁶ and London Plan policy⁸⁷.
- 6.74 Based on the guidance, the existing Ham Close has a child yield of 105 children. Following development, the scheme will support 249 children (+144)⁸⁸. The requirement is for 10m² of playspace per child.
- 6.75 The proposals include 1,774m² of play space within the residential site, and 793m² at Ham Village Green. A summary is provided below:

	Communal Courtyards	Linear Park	Ham Village Green	TOTAL
0-4 Provision	720m ²	489m ²	0	1,209m ²
5-11 Provision	0	493m ²	356m ²	849m ²
12-15 Provision	0	0	286m ²	286m ²
16-17 Provision	0	0	151m ²	151m ²
TOTAL	720m ²	982m ²	793m ²	2,495m²

Table 11: Play Space by Area (abridged from LUC Landscape Report 2022)

- 6.76 In addition to the above self-sufficiency of the Site for play space and recreation, the Site is also within a 10 min walk (800m) of Riverside Drive Playground, Sandy Lane Recreational Ground, Ham Playing Fields and King George’s Playing Field.

Open Space

- 6.77 Ham is blessed with easy access to substantial open space. Within a 15 min walk (1,200m) of the Site, there is access to 7 Public Gardens⁸⁹ and 6 Natural Green Spaces⁹⁰. Within a 5 min walk (400m) the amenity spaces of Ham Village Green and Sandy Lane Recreation Ground can be accessed.
- 6.78 The proposals involve the incorporation of an area of Other Open Space of Local Townscape Importance (OOLTI) on the western edge of the existing Ham Close. In accordance with Policy 31 of the Local Plan, an Open Space Assessment has been carried out by LUC. This

⁸⁶ Policy LP31 Public Open Space, Play Space, Sport and Recreation, LBRuT, P102,

⁸⁷ Shaping Neighbourhoods: Play and informal Recreation, SPG, September 2012.

⁸⁸ Numbers rounded up (Existing 104.6 and proposed 248.7). Figures based on LUC calculations 2022.

⁸⁹ Grove Gardens, Radnor Gardens, Secret Garden, Holly Road Garden of Rest, York House Gardens, Orleans House Gardens and Orleans Gardens.

⁹⁰ Ham Lands, The Copse, Ham Common, Ham Common Woods, Petersham Lodge Woods and Petersham Meadows.

demonstrates that the OOLTI space can be re-provided through the inclusion of a new Linear Park together with other private open spaces (such as communal courtyards and gardens) across the development. There will be an overall increase in open space of 1,753m².

Ham Village Green

- 6.79 Ham Village Green is situated to the east of the existing buildings on Ham Close. It is designated Public Open Space (POS)⁹¹ and Other Open Land of Townscape Importance (OOLTI)⁹². It is also designated as “Green Space” in the Ham and Petersham Neighbourhood Plan⁹³, and subject to a Community Proposal⁹⁴.
- 6.80 For the avoidance of all doubt, the proposals do not involve the development of any land on Ham Village Green. The Community Proposal seeks to encourage the ongoing enhancement of the village green. The neighbourhood plan states that:

“The land is allocated for Public Open Space in the Richmond Local Plan, and provides a valued amenity for local people. The significance of this open space is likely to be enhanced if Ham Close is redeveloped”⁹⁵.

- 6.81 Building footprints have been carefully positioned in relation to the Green, creating a better interface, and allowing the green to “flow” into the new Linear Park, integrating the development. Through consultation, the Community Centre design has been refined and located entirely on under-utilised hardstanding to the rear of shops on Ashburnham Road. There is no overhang or oversailing of the upper floors on the village green.

Western Boundary

- 6.82 The Site includes a small strip of land on the western boundary of the existing Ham Close. This is to the rear of Hatch House on land owned by LBRuT. The strip of land is included in a wider School Playing Field designation and OOLTI.
- 6.83 Although included in the designation, the segment of land is not used as functional playing fields and has Secretary of State approval for disposal to enable the Ham Close regeneration⁹⁶. Sport England have also been consulted on the proposals, and have provided the following comment:

“...the strip of land in question is not capable of forming part of a playing field. Having checked historical aerial photography, this strip has never been used as a playing field. It is an irregularly shaped piece of land that appears to be planted over, and is also close to trees. It is not advisable to use land too close to trees as playing field as leaf drop can present health and safety issues. Therefore Sport England would be unlikely to object to this element.”

⁹¹ Policy LP31 of the Adopted Local Plan, LBRuT.

⁹² Policy LP14 of the Adopted Local Plan, LBRuT.

⁹³ Figure 7.1 “Green Spaces” Ham & Petersham Neighbourhood Plan 2018-2033 (Site 4)

⁹⁴ Community Proposal 5 – Ham Village Green.

⁹⁵ Paragraph 9.13.3, Page 94 of Ham & Petersham Neighbourhood Plan 2018-2033

⁹⁶ Consent under section 88 of the School Standards and Framework Act 1998, Granted 02 June 2020.

- 6.84 The above statement is made without prejudice to the determination of the planning application. The capital receipt from the land transfer will be re-invested in a multi-use games area for the school and community to use, for which the Council are applicants.
- 6.85 This Planning Application is accompanied by both a detailed Open Space Assessment and a Playing Field Assessment by LUC.

Metropolitan Open Land

- 6.86 The Site does not include any Metropolitan Open Land (MOL). However, MOL designations exist in the wider area. MOL nearby includes Grey Court School to the east; Ham Lands and River Thames to the North, west and south west; Riverside Drive to the North; and, Ham Common & Richmond Park to the South East.
- 6.87 As previously developed land already encompassed by surrounding streets and buildings, the proposals will not have a direct effect on any MOL. The scale of buildings are also consistent with the Urban Character Study. The layout and orientation of the blocks will enable potential views through to the MOL along the Linear Park with a better line of sight and aperture than is possible across the dispersed buildings presently at Ham Close. This would support the ambitions of adopted planning policy⁹⁷ to improve visual openness.
- 6.88 The regeneration of previously developed land for additional housing will also reduce pressure on less suitable sites to be developed. This is in accordance with National, London, Local and Neighbourhood planning policies.

Natural Environment

Trees

- 6.89 There are currently 87 trees on site. The trees are not protected by either a Tree Preservation Order (TPO) or through Conservation Area status. However, the proposals have been sensitively designed to retain as many trees as possible, particularly those categorised as “A” quality specimens. Regard has been had to adopted planning policies regarding Trees and Landscape⁹⁸.
- 6.90 To facilitate a meaningful redevelopment, it is inevitable that some trees will need to be removed. The proposals retain 46 trees, including three of the four Category A trees. Furthermore, an additional 124 trees will be planted as part of the proposals. Overall, this will lead to a net increase of 83 trees, representing more than two new trees for every specimen removed.
- 6.91 New planting will be focussed on native species, as detailed in the landscape strategy by LUC. Consideration has been given to future canopy and root spread of the trees to ensure longevity⁹⁹. Furthermore, in accordance with planning policy¹⁰⁰, particular consideration has

⁹⁷ Policy LP13 C Green Belt, Metropolitan Open Land and Local Green Space, Adopted Local Plan, LBRuT.

⁹⁸ Policy LP16 Trees, Woodlands and Landscape.

⁹⁹ See Greengage Arboricultural Impact Assessment, 2022.

¹⁰⁰ Policy LP11 Subterranean developments and basements, adopted local plan 2018, LBRuT.

been given to the soil depth above the basement. Here, a 1.2m (comprising of 1m naturally draining permeable soil and 200mm drainage layer) is provided for the 32 trees above this area.

Ecology

- 6.92 The proposals will achieve a biodiversity net-gain of 23.2%¹⁰¹, notably above current requirements and also above the emerging policy requirements of 20%¹⁰². Furthermore, the site will achieve an Urban Greening Factor (UGF) of 0.48. This is above the requirement of 0.4 set out in the London Plan¹⁰³.
- 6.93 The design incorporates a number of ecological features. The Linear Park straddling the Site connects Ham Village Green to the playing fields beyond creating a biodiverse corridor across the Site and improving ecological connectivity. The scheme includes sparrow and swift boxes for birds and loggeries for insects and invertebrates.
- 6.94 A Bat Survey has been undertaken as part of the ecology investigations. Undertaken by licenced ecologists, the emergence surveys concluded that there is no evidence of roosting bats on site. Low levels of commuting and foraging were recorded. The impact of the Proposed Development upon local bat populations is expected to be negligible. Nonetheless, positive measures are incorporated, including Bat Boxes in appropriate buildings and trees.
- 6.95 In accordance with local policy¹⁰⁴ over 70% of the roof plates are utilised as biodiverse roofs. This includes the residential flat blocks and the Community Centre.

The Community Centre

- 6.96 The scheme includes a new Community Centre, replacing the current facility in Ham Close. As described in Section 2, the Centre will be positioned on hardstanding at Ashburnham Road rather than in its current location behind the Ham Clinic. The new location is in accordance with the aspirations of the Ham and Petersham Neighbourhood Plan¹⁰⁵. The new location is also favoured by local residents (both within and beyond Ham Close). The new location of the new Community Centre offers the following benefits:
- Immediately opposite the bus stop and shelter, for both accessibility and ease of access.
 - Frontage on Ashburnham Road, a prominent road frontage for a civic building.
 - Helps support a complementary cluster of community and business activities (shops and library).
 - Provides a better visual appearance to mask the functional, but unattractive rear to existing shops.

¹⁰¹ See Greengage, Biodiversity Net Gain Calculation, 2022.

¹⁰² Policy 39 A (5), Regulation 18 Draft, LBRuT, 2022.

¹⁰³ Policy G5, Adopted London Plan, 2021.

¹⁰⁴ Policy LP 17, Green Roofs and Walls, LBRuT, Adopted Local Plan 2018

¹⁰⁵ Paragraph 9.11.5 of the H&PNP states “If the redevelopment scheme includes the existing community facilities then provision must be made for their replacement without reducing the capacity. These should be grouped together to form a cluster of uses rather than being dispersed across the site and should be located on the Ashburnham Road side of the site, to complement the Ashburnham Road / Ham Street shopping centre and the public library”.

- Can be built in Phase 1 and doesn't require the demolition of buildings, enabling continuity of community facilities during construction.

6.97 Policy LP28 of the adopted Local Plan, states that “*proposals for new or extensions to existing local and community infrastructure will be supported*”, subject to three criteria. These are:

1. *it provides for an identified need;*
2. *is of a high quality and inclusive design providing access for all; and*
3. *where practicable is provided in multi-use, flexible and adaptable buildings or co-located with other social infrastructure uses which increases public access.*

6.98 Taking each of the criteria in turn, there is an identified need for the facilities. The existing community centre is well-used by a number of groups, including TAG Youth Club¹⁰⁶. Furthermore, The LBRuT Infrastructure delivery plan makes note of the opportunity to improve the centre; stating “*ideally re-provision of the facility within this locality or further modernisation is aspired*”¹⁰⁷.

6.99 The proposed scheme also meets the second criteria. Namely that it is “*of a high quality and inclusive design providing access for all*”. The proposed design has been subject to rigorous independent design review and extensive officer and community consultation.

6.100 The third criterion of policy LP28 states that new community infrastructure will be supported “*where practicable is provided in multi-use, flexible and adaptable buildings or co-located with other social infrastructure uses which increases public access*”. The proposals have been designed to achieve just that.

6.101 The Community Centre continues to be multifunctional. The main activity hall can be used for both performances and sport, with a double height ceiling and a floor area of 163m². Meanwhile, complementary ICT rooms, lounge and rooms for music rehearsal have all been considered as part of a Council-led brief for the site. The overall floorspace for the new centre is circa 101m² greater than the existing facility. The additional space is necessitated by the inclusion of the Changing Rooms, community lounge, additional storage, provision of access lift, modern plant areas and the additional circulation required for to meet the current building regulations and fire guidance.

MakerLabs

6.102 Although not a community centre, the MakerLabs can nonetheless be considered to be a positive contributor to local social infrastructure. The facility is relatively small and run by volunteers and charitable donations. It does not feature in the Councils Infrastructure Plan, falling outside conventional measures of community facility need and assessment. Nevertheless, the existing premises are well used, and the design has been subject to consultation with the current volunteers and the Council. The new Makers Lab will allow

¹⁰⁶ See [What We Do | TAG Youth Club](#)

¹⁰⁷ Page 52, LBRuT Infrastructure Delivery Plan, April 2017.

access for all and the additional space will allow a better layout for users. There is an increase of 83m² in floorspace in comparison to the existing MakerLabs.

6.103 The MakerLabs is located at the end of the Linear Park. Design allowances have been made for noise, ventilation and outside storage in the new facility. It is purposefully an independent building from both the residential homes and the new community centre.

Transport & Highways

6.104 Ham Close has a low Public Transport Accessibility Level (PTAL) of 1b, and therefore not considered suitable for a car free development in either adopted or emerging planning policies. The London Plan advises that for an outer borough such as Richmond, a *maximum* parking provision of up to 1.5 spaces dwelling is appropriate¹⁰⁸. Emerging local Planning Policy also cites this standard¹⁰⁹.

6.105 A total of 287 parking spaces are provided. Of this figure 3 blue badge spaces are associated with the Community Centre (2) and Maker Labs (1). There are also 2 car club spaces provided as part of the development. These spaces will be available to both residents of Ham Close and the wider Community. The applicant has already secured an agreement in principle with Car Club Provider, ZipCar to show the commercial viability of such a proposal¹¹⁰.

6.106 The proposals also include 14 blue badge spaces for the new homes (3%). These enlarged wheelchair accessible bays will be provided from the outset, with the ability for expansion of an additional 7% of bays if required. The bays have been designed in accordance with London Plan Policy¹¹¹. This includes being located in close proximity to block entrances and/or lift cores. The spaces will also meet the relevant British Standard¹¹² when built.

6.107 The development will be constructed to ensure that a minimum of 20% of bays are served by an “active” electric vehicle charging point (EVCP), with all remaining spaces having “passive” provision to allow easy installation of additional points if required.

Cycle Spaces

6.108 The Site is ideally suited for Cycling. However, there is limited provision on site presently (1 dedicated shelter of 12 spaces), with residents more accustomed to storing bikes within their flats or communal corridors. Noting the small sizes of existing flats, this compromises living arrangements and raises issues of safety.

6.109 In contrast to Car Parking, the Cycle parking standards are minimum standards. The development includes 800 Long Stay Cycle Spaces exceeding the requirements of the Richmond Local Plan¹¹³ and London Plan¹¹⁴ by ten spaces. There is also an additional 13 Short stay Visitor Cycle spaces in accordance with the standards. These are located within the

¹⁰⁸ Table 10.3 – Maximum Residential Car Parking Standards, London Plan 2021.

¹⁰⁹ Policy 28: Vehicular Parking Standards (C), LBRuT, 2021.

¹¹⁰ See Appendix G of Transport Assessment by Velocity Transport, 2022.

¹¹¹ Policy T6.1 (H) Residential Parking.

¹¹² British Standard BS8300vol.1 Design of an accessible and inclusive built environment. External environment

¹¹³ Policy LP 45 Parking Standards and Servicing’. Adopted Richmond Local Plan, LBRuT, 2018.

¹¹⁴ Table 10.2 Minimum Cycle Parking Standards, London Plan 2021.

public realm. Regard has also been had to the London Cycle Design Standards (LCDS)¹¹⁵. This includes the provision of enlarged Sheffield standards for 40 of the cycle spaces.

Basement Car Parking & Viability

6.110 The proposed development relies upon a Basement Car Park to accommodate the majority of car parking spaces (238). In addition to car parking, the basement also allows the opportunity to locate plant and storage below street level. The inclusion of basement will deliver a number of benefits to the scheme.

6.111 It is recognised that a basement involves notable costs. However, the viability of the scheme would worsen without its delivery. Analysis by BPTW Architects¹¹⁶ show that alternate schemes with surface or podium parking would reduce the amount of amenity space available to residents by as much as 5,369m². Meanwhile, redistributing plant and storage to ground floor level would also reduce the number of homes that could be accommodated at ground floor. In the absence of a basement, there would be a loss of approximately 52 homes.

6.112 Noting that Ham is considered unsuitable for Tall Buildings of 7 storeys or more, this cannot be reconciled by simply adding additional storeys to the scheme. A scheme of 400 homes could not viably support the affordable housing needed for Ham Close, but equally as important, this would deliver a much poorer development of less value, both commercially and intrinsically. The benefits of the basement include:

a) Improved Street Facing Activity

6.113 There are numerous benefits of being able to provide front doors and living accommodation at ground level. Overlooking of public spaces and pedestrian routes help provide natural safety and surveillance (Conversely dead frontages are more susceptible to vandalism and graffiti). Furthermore, activity on the ground floor will increase the use of the public realm across the development instead of being focused on elevated amenity levels segregated by blocks and separated from the wider area beyond. A basement approach will more than double the amount of street facing activity.

b) Integrating the development with Ham and the suburban area beyond

6.114 Ham Close is already notably distinct from the suburban houses on Woodville and Ashburnham Roads to the north and south. The current site has sizable informal areas of hardstanding for parking. Substantial regimented forecourts of parking would create an alien environment that would reduce permeability and discourage pedestrians from walking through Ham Close. This would contradict one of the key aspirations of the proposed regeneration.

c) Supports Open Space re-provision

6.115 On the western boundary of the site, an area of former playing field land has been disposed of by the Council to facilitate development. Whilst separate arrangements have been agreed

¹¹⁵ London Cycle Design Standards (LCDS), Mayor of London and Transport for London, 2014,

¹¹⁶ See accompanying Design & Access Statement by BPTW Architects, Pages 103-105, 2022.

with the Secretary of State regarding its disposal, the land nonetheless remains designated as Other Open Land of Townscape Importance (OOLTI) and playing fields. The ability to re-provide additional open space within the site through the new linear park is considered a necessary and positive substitution. Without its inclusion, the benefits are diluted. It would also fall short of the expectations in the local plan¹¹⁷.

d) Supports Housing Delivery

6.116 The loss of 52 homes to support either surface or podium parking would prevent development from happening. Irrespective of tenure implications, such a significant loss of homes would reduce the overall amount of housing stock delivered. And, in the context of the developments overall quality, would impact sales revenues that support the affordable housing on site. It would not optimise the land. It should also be noted that the remaining homes would be diminished in appeal if set within a hard urban environment of parking and podiums. This would impact sales values further exacerbating viability issues.

e) Sustainability and Biodiversity benefits

6.117 A basement enables a greater quantum of soft landscaping and open space to be provided across the development. These areas will benefit from more tree coverage than would otherwise be possible if interrupted with parking bays. Above the basement, soil depths are sufficiently deep to allow the planting of significant trees. A wider open landscape will also make it easier for insects and animals to use the areas as habitats. This will assist in ensuring a biodiversity net-gain from development and a higher Urban Greening Factor than would otherwise be possible.

Healthy Streets

6.118 The development has been designed in accordance with the Healthy Streets principles¹¹⁸. The proposals will create a new linear park for pedestrians. The proposals will “*increase the balance of space given to people to dwell, walk and cycle*”. The space is used more efficiently, replacing substantial hardstanding for car parking with a defined hierarchy of streets and open spaces. The Site is permeable for pedestrians in both a north-south and also in an east-west direction.

Suitability of a basement

6.119 Intrusive investigations show that the Site is suitable for a basement. The land is in Flood Zone 1 (the lowest on the scale) where basements are considered acceptable¹¹⁹. Drainage, flood assessments and ground condition and structural surveys conclude that basement development is appropriate.

¹¹⁷ See Policies LP14, LP31 and SA 15.

¹¹⁸ See Healthy Streets Qualitative Assessment, 2021 www.healthystreets.com; Also London Plan Policy T2.

¹¹⁹ Policy LP 21 B Flood Risk and Sustainable Drainage : Basements and subterranean developments. Adopted Local Plan, LBRuT, 2018.

6.120 The basement is part of an overall development project and not an isolated excavation under existing buildings. Whilst adopted policy¹²⁰ and local planning guidance¹²¹ is focussed towards domestic basement extensions (rather than parking and plant) the proposals nonetheless accord with policy requirements. The basement does not contain any habitable rooms. The basement is centrally located within the Site and a notable distance from homes on Woodville Road, Ashburnham Road and the Woodville Centre. It would not impact on any TfL underground assets and does not impact on any existing services or utilities. The proposals include a minimum 1 metre naturally draining permeable soil layer together with a minimum 200mm drainage layer above the basement.

Heritage and Townscape

6.121 The Site does not feature any Statutory Listed, locally listed or non-designated heritage assets on site. The Site does not lie within a Conservation Area. The Site is not within any Strategic Viewing Corridors or their buffer zones.

6.122 Beyond Ham Close, but within the vicinity of the Site, are a number of Heritage Assets. These are detailed in the accompanying Heritage Townscape and Visual Impact Assessment by Savills Heritage. Nearby conservation areas include the Ham House Conservation Area¹²² and Ham Common Conservation Area¹²³.

Demolition (Townscape)

6.123 The existing buildings are not considered to be of any architectural merit, either individually or as a group. Constructed in the 1960s, the buildings are of brick and render, with PVC panelised windows. The external render is punctuated with ventilation covers and pipework. The appearance of the buildings does not positively contribute to the townscape. Therefore, their demolition is considered acceptable in design terms.

¹²⁰ Policy LP 1, Subterranean developments and Basements, Adopted Local Plan, LBRuT, 2018.

¹²¹ Planning Advice Note – Good Practice Guide on Basements, LBRuT 2015 and Basement User Guide, Metis Consultants for LBRUT, 2021

¹²² CA23

¹²³ CA7



Figure 12: Existing Edwards House.

Fire Strategy

6.124 From inception, the proposals have been designed with the detailed input from specialist Fire Consultants, Affinity. This includes consideration of structural and material fire resistance, a detailed evaluation of layouts and means of egress in the event of a fire. Active measures relating to smoke ventilation, fire suppression (sprinkler systems) and Fire Brigade access have all been considered in line with London Plan policy¹²⁴.

Secured by Design

6.125 Ham & Petersham & Richmond Riverside benefit from low levels of crime, significantly below the London Average¹²⁵. However, the design of the proposals offer the opportunity to improve security and aid crime prevention. The proposals were subject of a review by local Metropolitan Police Designing Out Crime officers as part of the design process, in accordance with London Plan policy¹²⁶. This included issues such as lighting, boundary treatments as well as door and window specifications.

Sustainability

¹²⁴ Policy D12, Fire Safety, London Plan 2021.

¹²⁵ Metropolitan Police, Crime Data Dashboard. (116 crimes vs 175 crimes per 1000 population (Feb 2020-Jan 2022))

¹²⁶ Policy D11, Safety, Security and Resilience to emergency, London Plan 2021.

6.126 Redevelopment of the Site will contribute to a number of the Council’s sustainability objectives. At its most simplistic, the Ham Close regeneration will optimise the use of existing previously developed land and existing social infrastructure will be rejuvenated through a new Community Centre and MakerLabs. However, more practically, the proposals include a number of measures to minimise greenhouse gas emissions and introduce renewable technologies to Ham Close. Alongside the sustainable approach to energy, inherent in the scheme (and its construction) are features to manage heat risk, minimise water consumption and reduce waste.

The Circular Economy

6.127 It is recognised that the ongoing refurbishment and maintenance of the buildings at Ham Close is not sustainable over the long term and would not fulfil the policy objectives of local planning policies for the Site, nor the wishes of residents. Demolition is therefore required. Nonetheless, the proposals include measures to re-use a number of the building materials.

6.128 The existing masonry and brick will be crushed and used as piling mat. Meanwhile, the bricks from the western boundary will be re-used in the development. Felled trees will be kept on site wherever possible to stimulate biodiversity. Inert waste from the excavation of the basement will be re-used in line with London Plan policy¹²⁷ and emerging local plan policy¹²⁸.

6.129 The building materials are predominantly constructed of brick, which can be easily maintained, minimising costs to residents and is sustainably sourced. Fixtures and fittings will be chosen to ensure that they can be easily repaired and renewed across the lifetime of the development. A circular economy statement by Energist and a Construction Environmental Management Plan by Hill Residential form part of the Planning Application.

Energy

6.130 The development follows the established principles of the London Plan Energy hierarchy¹²⁹. Namely, the “Be Lean” (use less energy); “Be Clean” (supply energy efficiently), “Be Green” (use renewable energy) and “offset” stages. The completed development will also adhere to “Be Seen” (monitor and report performance).

6.131 The initial Be Lean stage for Ham Close includes an energy-efficient building fabric; insulation to all heat loss floors, walls and roofs; double-glazed windows; low-energy lighting; and efficient heating and ventilation systems all contribute to an enhancement in the energy performance.

6.132 The Council have an ambition to avoid gas boilers in all new developments in Richmond from 2024¹³⁰. The proposals support this. In line with efforts to “decarbonise the grid”, and generate energy from renewable sources, the scheme includes an all-electric Air Source Heat Pump (ASHP) led system serving the heating and hot water demands for each of the

¹²⁷ Policy SI 7 (5) Reducing Waste and the Circular Economy, London Plan 2021

¹²⁸ Draft Policy 7 Waste and the Circular Economy (Strategic Policy), Regulation 18 Draft LBRuT, 2022.

¹²⁹ See Figure 9.2 – The Energy Hierarchy and associated targets, London Plan page 344, 2021

¹³⁰ Council Climate Change and Sustainability Strategy 2019-2024, and Draft Policy 4 D (3) Regulation 18 Draft, LBRuT 2022

apartment blocks. Efficient heat pumps meanwhile will supply space heating and hot water to all homes within the apartment blocks. Individual Houses, the MakerLabs and Community Centre are proposed to be supplied by individual heat pumps. Supplementing these technologies, solar photovoltaics (PV) will be utilised on all suitable roof spaces.

6.133 Taken together, the proposals will ensure a 66% on-site Carbon Reduction above building regulations. This will significantly improve upon the minimum on-site Carbon Reduction targets of the adopted Richmond Sustainable Construction SPD¹³¹ and London Plan (35%)¹³². Looking forward, the proposals will also exceed the future policies proposed in the emerging local plan (60%)¹³³, which are timetabled to be adopted in 2024.

6.134 In addition to the above performance measures, the Community Centre and MakerLabs will achieve a BREEAM standard of “Excellent”, according with Local Plan Policy LP22.

Overheating

6.135 The proposals have been designed to minimise the potential for internal overheating and reliance on air conditioning systems. Future living conditions have been assessed using the established Chartered Institute of Building Services Engineers (CIBSE) TM59 methodology¹³⁴.

6.136 Measures to reduce overheating include a focus on improved Building Fabric, including glazing, achieving Natural Ventilation through Fully Openable Windows, the inclusion of Mechanical Ventilation with Heat Recovery (MVHR) in all habitable rooms and an increase in tree planting throughout the development to provide shade in the public realm.

6.137 An overheating assessment is provided as part of the Energist Energy Statement that accompanies the planning application, according with London Plan Policy¹³⁵.

Water Usage

6.138 The design seeks to minimise water consumption in line with the adopted Richmond¹³⁶ and London Plan policies. Namely, achieving a mains water consumption of 105 litres or less per head per day (excluding allowance of up to five litres for external water consumption)¹³⁷.

6.139 Overlapping with the commitments in the BREEAM pre-assessment, the proposals will achieve the relevant water standards for the Maker Labs and Community Centre. This includes a 40% water demand reduction over the BREEAM baseline through water efficient sanitaryware (the London Plan identifies at a least a 12.5% improvement).

¹³¹ Sustainable Construction Checklist SPD, Page 9, 2020, LBRuT

¹³² Policy SI 2 (C) Minimising Greenhouse Gas Emissions, London Plan, 2021.

¹³³ Draft Policy 4 : Minimising Greenhouse gas emissions and promoting energy efficiency (Strategic Policy), Regulation 18 Draft, 2022

¹³⁴ TM59 Design methodology for the assessment of overheating risk in homes (2017)

¹³⁵ Policy SI 4 Managing Heat Risk, London Plan 2021

¹³⁶ Policy LP22 Sustainable Design & Construction, LBRuT, 2021.

¹³⁷ Policy SI 5 (C) Water Infrastructure, London Plan 2021

7. Affordable Housing Statement

- 7.1 This section provides a detailed chapter on affordable housing. In addition to the policy analysis undertaken in the previous section, this affordable housing statement covers the issues of housing needs, delivery of affordable housing and the nature of the affordable housing being provided.

Registered Provider of Social Housing

- 7.2 The applicant is Hill Residential. However, all affordable housing on the Site will continued to be owned and managed by Richmond Housing Partnership (RHP). Since the original Stock Transfer took place in 2000, RHP have forged strong relationships with the local community on Ham Close with dedicated housing officers and regeneration managers overseeing the project. They will continue to be custodians of the scheme and support tenants into the future once built.
- 7.3 RHP is registered under the Co-operative and Community Benefit Societies Act 2014 and is registered with the Regulator of Social Housing (RSH) as a housing provider. At the time of this Affordable Housing Statement RHP own or manage 9,273 homes in London¹³⁸.

Nomination Rights

- 7.4 LBRuT will be granted nomination rights in respect of the additional affordable rented housing constructed as part of this regeneration project. This includes the shared ownership and London Living Rent homes). LBRuT will also have 75% of the re-lets of the replacement and additional rented homes. This is in accordance with the standard nominations arrangements that exist between RHP and LBRuT.

Needs Assessment

- 7.5 In 2017, RHP carried out a housing needs assessment, which led to the production of a plan of units required to rehouse current residents. The commitment to the community is to a “*one move where possible*” solution. The exception being Hatch House, which will need to demolished in the first phase of development.
- 7.6 This assessment informed the re-provision of homes and was formally agreed with the Council prior to the selection of Hill Residential. The one-move solution was also included in all tender documentation as a key development requirement.

¹³⁸ RHP Annual Report & Statement of Accounts Financial Statement 2021.

- 7.7 At the time of this report there are 9 RHP tenanted households at Hatch House. 4 have been offered a temporary home at Ham Close. These 4 households will have to move twice. Once to move from Hatch House to another existing block on the Estate prior to development, and then a second time into their final home on the estate.
- 7.8 5 have been offered a home off-site, beyond Ham Close. These 5 households will have a Right to Return to choose to return to Ham Close once their home has been built, but may choose to remain off-site should they wish to. Therefore a minimum of 4 and a maximum of 9 households will be subject to two moves as a result of the estate regeneration.

Tenure distribution

- 7.9 The following plan shows the distribution of affordable housing across the proposal. The pink and dark pink colour denotes affordable rent (the darker shade representing additional affordable rent). The Green represents leaseholder re-provision. Yellow represents shared ownership and orange represents London Living rent. The numbers denote phases.

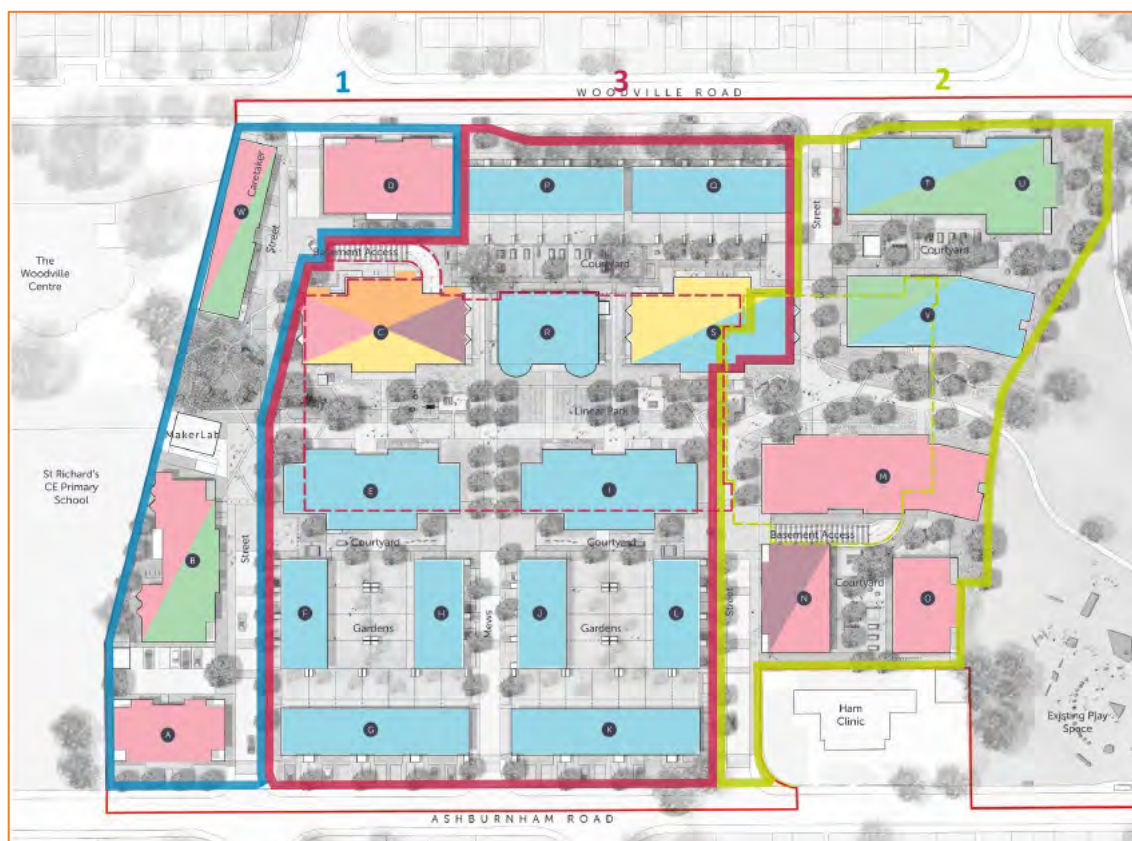


Figure 14: Tenure distribution Plan (BPTW 2022).

7.10 The scheme is designed to ensure all homes have a positive outlook. However, it is notable that the affordable housing will generally have the most expansive views across the Village Green to the east and playing fields to the west.

Phasing

7.11 In addition to the one-move solution, there is also a requirement to build the scheme in “no more than three phases”. This is to minimise disruption to existing residents on the estate. The proposals have been designed to be delivered in three distinct phases.

7.12 As shown in the diagram above, the first phase consists of entirely affordable housing and social infrastructure (Community Centre & MakerLabs).

Phase	Blocks	Affordable Homes	Leaseholders	Market	TOTAL	Estimated Completion
1	A, B, W, D	63	7	0	70	Oct 2024
2	T, U, V, M, N, O	82	23	55	160	May 2027
3	C, P, Q, R, S, E, I, F, H, J, L, G & K	76	0	146	222	Mar 2030

Table 12: Phasing & Housing Delivery

7.13 The following graph shows how the affordable housing is delivered by phase over 6 years.

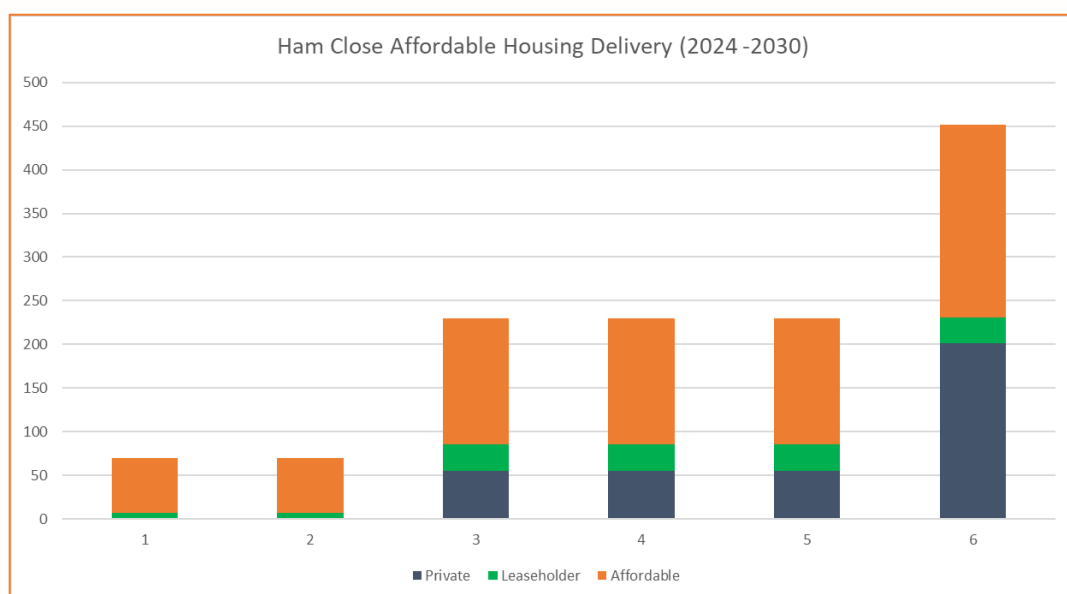


Figure 15: Housing Delivery by year of development

Affordable Tenures

7.14 The following affordable tenures will be delivered as part of the scheme.

Reprovided London Affordable Rent and Social Rent

7.15 All existing residents in Ham Close will remain on the same rent structure and same tenancy rights as existing. As described in Section 3, all residents have been provided with a “Customer Offer” according to needs. However, those residents with studio apartments will be upgraded to 1 bedroom homes.

7.16 143 homes will be re-provided on these terms. The homes consist of 93 x 1 bedroom homes; 37 x 2 bedroom homes and 13 x 3 Bedroom homes. Of this figure 63 homes will be delivered in Phase 1 with 80 homes delivered in Phase 2.

Additional London Affordable Rent

7.17 There will be 21 London Affordable Rent (LAR) homes above the existing re-provision. This consists of 8 x 1 bedroom homes; 10 x 2 bedroom homes and 3 x 3 Bedroom homes. It should be noted that “London Affordable Rent” is distinct from “Affordable Rent”. LAR Rents are set and in accordance with GLA guidance¹³⁹ and are significantly below the national level of 80% of market value. Two of the additional LAR homes are provided in Phase 2, with the remaining 19 provided in Phase 3.

London Living Rent

7.18 The proposal includes 10 London Living Rent homes. These consist of a 7 x 1 bedroom homes and 2 x 3 bedroom homes. London Living Rent (LLR) is considered an “intermediate” affordable housing product¹⁴⁰. Rents are set locally at sub-market levels for average income families, enabling them to save up for a deposit. The LLR homes will be delivered in Phase 3.

London Shared Ownership

7.19 The proposal includes 47 London Shared Ownership homes. These consist of 22 x 1 bedroom homes; 24 x 2 bedroom homes and 1 x 3 Bedroom home. London Shared Ownership (LSO) is also considered to be an “intermediate” affordable housing product. LSO allows householders to acquire a share in a new home and pay a low rent on the remaining unsold

¹³⁹ Homes for Londoners Affordable Homes Programme Funding Guidance (Updated Online).

¹⁴⁰ Policy H6, London Plan 2021

share. Over time it is possible to “stair-case” up to own greater proportions of the home outright. The LSO homes will be delivered in Phase 3.

7.20 The following chart shows the split between different tenures of affordable housing in the proposed redevelopment of Ham Close.

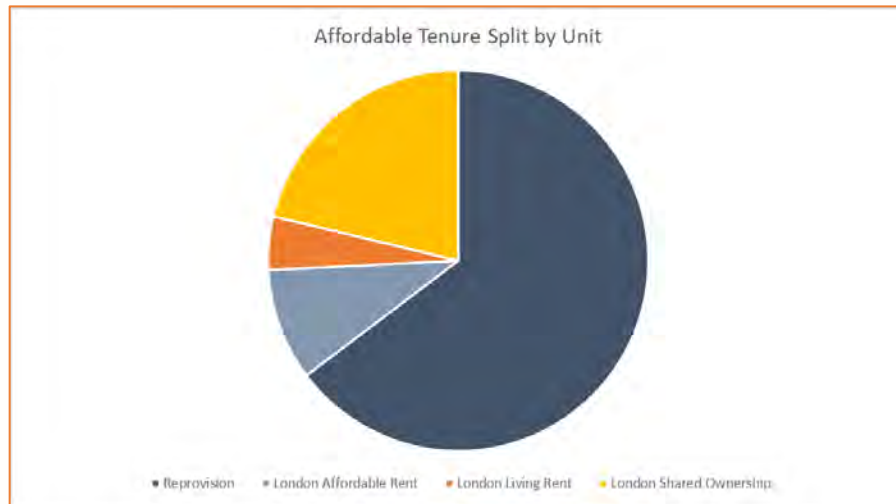


Figure 16: Affordable Housing by Unit.

Affordable Housing Benefits

7.21 The proposed affordable unit mix will lead to the following benefits

- An increase in affordable homes compared to existing
- An increase in affordable habitable rooms compared to existing
- An increase in affordable housing floorspace compared to existing
- An increase in individual housing floorspace for re-provided homes
- A proposed mix tailored to individual needs at Ham Close

Viability and Review of Affordable Housing

7.22 All Estate Regeneration proposals are subject to a viability assessment¹⁴¹. The affordable homes provided in the scheme represents the “*maximum reasonable*” amount in accordance with the guidance. The assessment has been undertaken transparently by DS2, and forms part of the planning application submission for independent testing as part of the application process.

¹⁴¹ Paragraph 2.9 of the Homes for Londoners : Affordable Housing and Viability SPG, 2017. See Also Policy H5 (Threshold approach to applications) of London Plan 2021.

7.23 Proposals requiring viability testing are also subject to affordable housing review mechanisms. The review mechanisms will become a planning obligation as part of the section 106 agreement. This includes an early-stage viability review if an agreed level of progress is not made within two years of the permission being granted. There will also be a late-stage review.

8. Planning Obligations and CIL

Context

- 8.1 The Applicant and RHP are intending to enter into a legal agreement with the London Borough of Richmond upon Thames (LBRuT) under s106 of the Town and Country Planning Act 1990. This is to secure certain obligations through development of the land.
- 8.2 The scope of planning obligations are set out in the CIL regulations¹⁴². They must be i) necessary to make the development acceptable in planning terms; ii) Directly related to the development; and, iii) Fairly and reasonably related in scale and kind to the development.
- 8.3 Additional Guidance is provided by the National Planning Practice Guidance¹⁴³. Specific regard has also been had to the LBRUT supplementary planning document on Planning Obligations¹⁴⁴.

Heads of Terms

- 8.4 The following planning obligations are proposed as part of the development:

Affordable Housing

- 221 affordable homes (143 re-provided)
- At agreed Social Rent / London Affordable Rent / London Living Rent / London Shared Ownership levels
- Nominations Agreement for additional London Affordable Rent above re-provision
- Viability Review Mechanism

Transport

- S278 agreement for works to ensure integration of development with surrounding highways
- Provision of a Residential Travel Plan
- Provision of up to two Car Club Spaces
- Contribution to Car Club Membership
- Car Free Agreement should a future Controlled Parking Zone come into force on surrounding streets.

¹⁴² Regulation 122 (as amended by 2011 and 2019 Regulations) and as policy tests in Paragraph 56 of the National Planning Policy Framework.

¹⁴³ [Planning obligations - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/planning-obligations)

¹⁴⁴ Planning Obligations, Supplementary Planning Document (SPD) LBRuT, June 2020.

Social Infrastructure

- Delivery of Community Centre and MakerLabs

Management

- Management of open spaces and SuDS features

Ecology

- Habitat enhancements (Bat, Bird Boxes and Hedgehog Domes)

Trees

- Net Gain in Trees
- Tree Bond based on CAVAT value of specimens replaced
- Replacement Tree Planting for up to five years

Climate Change

- Carbon Off-Set Contribution
- Adherence to Sustainable Construction Checklist
- “Be Seen” Energy Monitoring for development
- Submission of BREEAM Compliance Certificate (Excellent)

Employment and Skills

- Training and employment plan for Richmond residents
- Local Procurement (Construction Phase)

Construction

- Contractor to be a member of the Considerate Constructors Scheme

Legal Fees

- Payment of the Council’s legal fees and reasonable monitoring costs in enforcing the planning obligations

Community Infrastructure Levy (CIL)

8.5 The Community Infrastructure Levy is applicable to the scheme. At the time of this report, the two relevant Charging Schedules are:

Mayoral CIL 2 (MCIL2)

8.6 MCIL2 came into force on the 1 April 2019. The London Borough of Richmond Upon Thames, is in the highest charging band, Band 1. The charge is £80 per m², and applicable to all uses.

London Borough of Richmond upon Thames CIL (LBRuT CIL).

8.7 The LBRuT CIL came into force on the 1 November 2014. Ham Close lies within the “Lower” Charging Band. Here the residential development is charged at a rate of £190 per m². There is no levy applicable to Community Uses in the LBRuT CIL.

Indexation of CIL

8.8 It should be noted that the figures stated above are subject to Indexation from the date of adoption. Since the LBRuT CIL was adopted, the applicable indexed rate for residential now stands at £263.93 per m² (+£73.93) according to the Councils latest information¹⁴⁵. The indexed rate for MCIL2 is £80.48¹⁴⁶ (+£0.48).

8.9 At the time of this planning statement, there are significant inflationary pressures affecting both the UK and the world economy and it is anticipated that these costs will increase.

¹⁴⁵ CIL Annual Charging Rate Summary, LBRUT (2022)

¹⁴⁶ CIL Annual Charging Rate Summary, GLA (2022).

9. Planning Benefits

- 9.1 This planning application accords with adopted policies at a National, Regional and Local level. Beyond the technical compliance, this chapter summarises the key benefits that would result from the approval of this application.

Delivery of an allocated site

- 9.2 Ham Close is allocated for redevelopment in both the adopted and emerging local plan. It is also identified for redevelopment in the Ham & Petersham neighbourhood plan. The delivery of an allocated site adds to the robustness of the plan process and will help reduce development pressure on other less suitable sites.

Provision of 452 Homes

- 9.3 It is recognised that there is “Housing Crisis” in London¹⁴⁷. There is an identified need for new housing of all tenures across the borough. The adopted local plan makes specific reference to Ham Close contributing additional housing as part of the Councils Strategic vision for a sustainable growth.

49% Affordable Housing

- 9.4 The Borough has around 10,000 social housing units; this represents the fifth lowest social housing stock in London and as at 1st April 2020 there were 4,100 applicants on the housing register¹⁴⁸.
- 9.5 The proposed scheme includes 221 affordable homes. This includes London affordable rent, London Living Rent and London shared ownership homes. At the time of writing the latest London Plan Annual Monitoring Report¹⁴⁹, records a three year net conventional affordable completion of 173 homes (14%) for LBRuT. The additional affordable homes will make a positive contribution to the supply of genuinely affordable housing in the borough. Furthermore, the delivery of affordable housing is “front-loaded” into the earlier phases.

Improved Homes for Ham Close Residents

- 9.6 The redevelopment will be transformative for residents of Ham Close. Existing tenants have actively sought new homes rather than a refurbishment of the properties. Current homes are well maintained by RHP, but fundamentally flawed by cramped flat sizes, the absence of private amenity space and re-occurring issues of damp. Furthermore, the absence of lifts in any of the flat blocks make the homes inappropriate for residents with mobility issues.

¹⁴⁷ London Housing Strategy 2018.

¹⁴⁸ Housing and Homelessness, LBRuT Strategy 2021-2026, P23.

¹⁴⁹ Table 2.7 AMR 16 Published March 2021.

- 9.7 In contrast, on a like-for-like basis, all homes will increase in size to meet or exceed national space standards. Lifts will be included in all apartment blocks. All homes will have access to their own private amenity space. 10 per cent of the units will meet M4(3) adaptable for wheelchair dwelling standards and the mix will help contribute to a mixed and balanced community.

A New Community Centre and MakerLabs

- 9.8 The proposals include a new modern Community Centre. The centre is better positioned than the current centre, being located next to existing facilities, the bus stop and Ham Green. It is more functional in terms of internal layout and accessibility and has been shaped by the many groups that use it, including TAG Youth club. The MakerLabs meanwhile will have a purpose-built building that will help support their ongoing role in educating and supporting the local community.
- 9.9 Social Infrastructure will be improved by the redevelopment. Delivered in Phase 1, the Community Centre and MakerLabs will be the first outward signs of the positive regeneration of the estate.

Sustainability Improvements

- 9.10 In July 2019, LBRuT declared a Climate Emergency for the borough and is committed to becoming Carbon Neutral by 2030. Development of the Site supports a sustainable pattern of development. For London to function as a compact city, brownfield sites such as Ham Close must be optimised. The improved density of the Site will ensure development in this location can make a positive contribution to sustainable living.
- 9.11 The existing homes are dependent on gas boilers, and have poor thermal performance and ventilation. In contrast, the scheme will have an improved building fabric, and will not be reliant on gas for energy. Instead Air Source Heat Pumps and Photo voltaics will be used as renewable energy sources.
- 9.12 The Proposed Development will also deliver a Bio-Diversity Net Gain of over 20%, exceed Urban Greening Factor Ratios, reduce surface water-run off and consider whole-life carbon resources throughout the lifetime of the development from the re-use of materials to the sourcing of appliances for the homes. Improvements to ecology, biodiversity, flood risk and energy use will all result from the Proposed Development.

Improved Amenity

- 9.13 The redevelopment will increase the number of homes. However, it is possible for this to be achieved with an increase in overall amenity. Existing substantial areas of hard standing and surface car parking are better utilised through a defined landscape strategy that includes a Linear Park, dedicated gardens and an increase in tree planting. Meanwhile private amenity is introduced to apartments currently lacking any balconies or terraces.

Collaborative and Inclusive Design

- 9.14 The development has been designed by BPTW Architects, whose projects have won over 100 awards including numerous Housing Design Awards and twice for the Building Magazine Architectural Practice of the Year. In collaboration with WR-AP architects, the scheme has been through significant design development and the design, layout, scale, and massing have been the product of extensive engagement with the Council, GLA and Design Review Panel members.
- 9.15 83% of all homes are either dual or triple aspect. There are no north facing single aspect homes. Such a high proportion is rarely achieved on sites of such scale.

Improved Appearance

- 9.16 The current buildings do not contribute to the local townscape and are of little architectural merit. The new proposals will be a positive addition to the area, taking visual cues from the rich heritage of Ham, and employing a range of brick types for both fine-grain detail and longevity. At the same time, the appearance of Ham Close will also improve through the new layout and landscape. The pedestrian Linear Park will encourage the use of the new open spaces by the wider community.

Package of Planning Gain Contributions

- 9.17 The Planning Application is supported by an overall package of contributions. This includes a Community Infrastructure Levy (CIL) payment estimated to exceed £7million, a Carbon Off-set Contribution for local sustainability funding, the provision of 2 car club spaces for use by both residents and the wider community, new cycle spaces throughout the landscape and improved play space. It is estimated that the development will also support 78 FTE construction jobs in the economy during the assumed 7 year construction period, and this will include commitment to local labour and training.
- 9.18 The development will contribute jobs during the construction period, which will be supported by a commitment to local labour contracts. Considering leakage, displacement, and multiplier effects this is considered to be around 32 additional FTE jobs for the local economy.

10. Summary & Conclusion

10.1 This Planning Statement has been prepared on behalf of Hill Residential. Full Planning Permission is sought for the following (the 'Proposed Development'):

“Demolition of existing buildings on-site and phased mixed-use development comprising 452 residential homes (Class C3) up to 6 storeys; a Community/Leisure Facility (Class F2) of up to 3 storeys in height, a “MakerLabs” (sui generis) of up to 2 storeys together with basement car parking and site wide landscaping.”

10.2 The detailed Planning Application covers an area of 4.69 hectares. The Site comprises of 14 flat blocks built in the early 1960s, together with a community centre and a caretaker store re-purposed for a “MakerLabs”.

10.3 The proposals have benefitted from substantial stakeholder and community engagement which has shaped the proposals over nearly a decade. This has included public exhibitions, resident meetings and wider consultations with the community of Ham and key stakeholders.

10.4 Together with extensive technical consultations with planning officers at the London Borough of Richmond upon Thames, the Greater London Authority, the Metropolitan Police, The Richmond Design Review Panel and other key stakeholders, the proposals represent a rigorously evaluated and high quality scheme.

10.5 The key planning benefits of the proposal include:

- The delivery of 452 New Homes
- 49% Affordable Homes
- Improved Homes for Ham Close Residents
- A New Community Centre and MakerLabs
- Sustainability Improvements
- Improved Amenity
- Collaborative and Inclusive Design
- Improved Appearance
- A Package of Planning Gain contributions.

10.6 Taken together, the planning application accords with the planning policy framework and will deliver numerous and considerable benefits. The case for planning permission is compelling.

Appendix 1 : Planning Applications

Cumulative Schemes (1 Mile Radius)

April 2022

Planning applications of 25+ units or in excess of 1,000 sqm within a c. 1 mile radius of Ham Close, TW10 7PG. Showing schemes in the London Borough Richmond and adjoining Kingston from 2016 to 2022.

Scheme	Description	Reference and Status
The Stag Brewery, Lower Richmond Road, Mortlake	Hybrid application to include: 1. Demolition of existing buildings (except the Maltings and the façade of the Bottling Plant and former Hotel), walls, associated structures, site clearance and groundworks, to allow for the comprehensive phased redevelopment of the site: 2. Detailed application for the works to the east side of Ship Lane which comprise: a. Alterations and extensions to existing buildings and erection of buildings varying in height from 3 to 9 storeys plus a basement of one to two storeys below ground to allow for residential apartments; flexible use floorspace for retail, financial and professional services, café/restaurant and drinking establishment uses, offices, non-residential institutions and community use and boathouse; Hotel / public house with accommodation; Cinema and Offices. b. New pedestrian, vehicle and cycle accesses and internal routes, and associated highway works c. Provision of on-site cycle, vehicle and servicing parking at surface and basement level d. Provision of public open space, amenity and play space and landscaping e. Flood defence and towpath works f. Installation of plant and energy equipment 3. Outline application, with all matters reserved for works to the west of Ship Lane which comprise: a. The erection of a single storey basement and buildings varying in height from 3 to 8 storeys b. Residential development c. Provision of on-site cycle, vehicle and servicing parking d. Provision of public open space, amenity and play space and landscaping e. New pedestrian, vehicle and cycle accesses and internal routes, and associated highways works.	Pending determination Ref: 22/0900/OUT
	4.5km northeast [beyond scope area but of Borough importance]	
	Erection of a three-storey building to provide a new secondary school with sixth form; sports pitch with floodlighting, external MUGA and play space; and associated external works including landscaping, car and cycle parking, new access routes and other associated works	Pending determination Ref: 22/0902/FUL
	4.5km northeast [beyond scope area but of Borough importance]	

<p>1-1C King Street, 2-4 Water Lane, The Embankment And River Wall, Water Lane, Wharf Lane And The Diamond Jubilee Gardens, Twickenham</p>	<p>Demolition of existing buildings and structures and redevelopment of the site comprising 45 residential units (Use Class C3), ground floor commercial/retail/cafe (Use Class E), public house (Sui Generis), boathouse locker storage, floating pontoon and floating ecosystems with associated landscaping, reprovion of Diamond Jubilee Gardens, alterations to highway layout and parking provision and other relevant works.</p> <p>1.1km northwest</p>	<p>Pending determination Ref: 21/2758/FUL</p>
<p>St Johns And Amyand House Strafford Road Twickenham</p>	<p>Construction of single-storey glazed infill extension, erection of canopy over existing garden area. Enclosure of existing opening to northern elevation and alterations to existing fenestration arrangement to facilitate use of building as SEN school for 28 students with associated landscaping and cycle storage</p> <p>1.5km north</p>	<p>Granted 15/05/2019 Ref: 18/4266/FUL</p>
<p>Old Station Forecourt Railway Approach Twickenham TW1 4LJ</p>	<p>Proposed redevelopment of existing car park to provide a new building of 5 to 6 storeys, comprising 46 no. residential units (Use Class C3), disabled car parking, cycle parking, landscaping, enhancements to public realm and associated works.</p> <p>1.6km northwest</p>	<p>Granted 03/03/2021 Ref: 19/3616/FUL</p>
<p>Land At Junction Of A316 And Langhorn Drive And Richmond College Site (Including Craneford Way East Playing Fields And Marsh Farm Lane) Egerton Road Twickenham</p>	<p>Outline application for the demolition of existing college buildings, removal of hardsurfacing, site clearance and groundworks together with the redevelopment of the site to provide:</p> <ol style="list-style-type: none"> 1) A new campus for education and enterprise purposes, comprising: Replacement College (Use Class D1) of up to 16,000sqm to accommodate up to 3,000 FTE day time students, as well as evening and weekend use; A Science, Technology, Engineering and Maths (STEM) Centre (D1 Use Class) of up to 6,100sqm; 2) A new Secondary School (D1 Use Class) of up to 7,000 sqm for up to 750 students; 3) A new Special Educational Needs (SEN) School (D1 Use Class) of up to 4,000sqm for up to 115 students; 4) A new ancillary 'Technical Hub' for Haymarket Media (B1 Use Class) of up to 1,700sqm; 5) Replacement on-site sports centre (D2 Use Class) of up to 3,900sqm to serve both the college, schools and wider community; 6) The upgrading of existing Craneford Way playing fields for use by the college, schools and local community; 7) Alterations to existing means of access for vehicles, pedestrians and cyclists from the A316 involving the creation of a signalised junction, alterations to the A316 footbridge and minor realignment of Langhorn Drive, alterations of existing vehicular access points on Egerton Road as well as the upgrading of Marsh Farm Lane footpath; 	<p>Approved 16 August 2016 Ref: 15/3038/OUT See Reserved Matters applications:</p> <ul style="list-style-type: none"> • 16/3293/RES; • 16/4747/RES; • 17/2332/RES • 18/4157/RES; • 19/2381/RES; • 19/2517/RES.

	<p>8) Provision of on-site parking (non-residential) for up to 230 vehicles, open space and landscaping, and</p> <p>9) A new residential development of up to 180 units together with associated parking for up to 190 vehicles, open space and landscaping.</p> <p>1.8km northwest</p>	
<p>Ryde House 391 Richmond Road Twickenham TW1 2EF</p>	<p>Demolition of existing building. Construction of a new mixed use development comprising a food store (1,123m² sales area) and primary school with associated car parking (55 spaces allocated to foodstore and 1 space allocated to school); alterations to site entrance, landscaping, and associated works.</p> <p>1.9km northeast</p>	<p>Granted 21/09/2017 Ref: 16/2777/FUL</p>
<p>Lockcorp House 75 Norcutt Road Twickenham TW2 6SR</p>	<p>Demolition of Lockcorp House; erection of a part four, part five-storey building comprising 9 no. student cluster flats (49 study/bedrooms in total); three car parking spaces including one disabled space, ancillary cycle and refuse storage and landscaping.</p> <p>2km northwest</p>	<p>Refused 19/09/2017 Appeal Allowed 23/05/2018 Ref: 17/1033/FUL</p>

Appendix 2 : Policy Documents

The following Documents are of relevance to the Planning Application.

Document	Link
Richmond Council	
Adopted Local Plan	adopted_local_plan_interim.pdf (richmond.gov.uk)
Local Plan Housing Monitoring Report (Nov 2020)	amr_housing_2019_20.pdf (richmond.gov.uk)
Local Housing Needs Survey Dec 2021	Local Housing Needs Assessment 2021 (richmond.gov.uk)
Urban Design Study 2021	Urban Design Study December 2021 (richmond.gov.uk)
Borough Wide Sustainable Urban Development Study, 2008	Sustainable urban development study (richmond.gov.uk)
Air Quality SPD, June 2020	air-quality-spd-june-2020.pdf (richmond.gov.uk)
Affordable Housing SPD 2014 and Weekly Rent Benchmarks 2021/2022	Affordable Housing Supplementary Planning Document (SPD) – London Borough of Richmond upon Thames
Buildings of Townscape Merit SPD 2015	buildings_of_townscape_merit_spd.pdf (richmond.gov.uk)
Design Quality SPD 2006	Design Quality Supplementary Planning Document (richmond.gov.uk)
Noise SPD 2018¹⁵⁰	See link in footnote below
Planning Obligations SPD 2020	planning_obligations_spd_june_2020.pdf (richmond.gov.uk)
Refuse and Recycling Requirements SPD 2015	LBRUT (richmond.gov.uk)
Residential Standards SPD¹⁵¹	See link in footnote below
Sustainable Construction Checklist, 2020	LBRuT Sustainable Construction Checklist SPD (richmond.gov.uk)
Transport SPD, 2020	Richmond Transport SPD

¹⁵⁰ [development_control_noise_generation_noise_sensitive_development_spd_adopted_september_2018.pdf \(richmond.gov.uk\)](#)

¹⁵¹ [spd_residential_development_standards_2010_final_version_30_11_10.pdf \(richmond.gov.uk\)](#)

Public Space Design Guide 2006	Public Space Design Guide – London Borough of Richmond upon Thames
Neighbourhood Plan	
Ham & Petersham Neighbourhood Plan, 2019	Ham & Petersham Neighbourhood Plan 2018 - 2033 (richmond.gov.uk)
Greater London Authority	
London Plan, March 2021	The London Plan London City Hall
Accessible London SPG, 2014	Creating a London Accessible to all London City Hall
Planning for Equality & Diversity SPG, 2007	mayor-strategies-sds-docs-spg-planning-for-equality.pdf
Character & Context SPG, 2014	Character and Context SPG 1.pdf
Fire Safety LPG Draft, 2021	Fire Safety Guidance (pre-consultation, for information) London City Hall
Good Quality Homes for all Londoners LPG, Draft, 2021	Good Quality Homes for All Londoners Guidance GLA Engagement Portal
Housing SPG, 2016	housing_spg_revised.pdf (london.gov.uk)
Play and Informal Recreation SPG, 2016	Play and Informal recreation London City Hall
Social Infrastructure SPG, 2014	Social Infrastructure London City Hall
Urban Greening Factor, LPG Draft, 2021	ugf - consultation version sept 2021.pdf (london.gov.uk)
Air Quality Positive LPG, Draft, 2022	Air Quality Positive (AQP) guidance London City Hall
Be Seen Energy Monitoring Guidance LPG, 2021	LPG document template (green) (london.gov.uk)
Circular Economy Statement LPG Draft, 2021	Circular Economy Statements London Plan Guidance London City Hall
Whole Life Carbon Assessments Draft LPG , 2020	WLC guidance consultation draft (london.gov.uk)
The Control of Dust & Emissions SPG, 2014	Control of Dust and Emissions London City Hall
Sustainable Transport, Walking & Cycling Draft LPG, 2021	Sustainable Transport, Walking and Cycling guidance London City Hall
Homes for Londoners Viability SPG, 2017	ah_viability_spg_20170816.pdf (london.gov.uk)

Better Homes for Local People, Estate Regeneration Practice Guide, 2018	Microsoft Word - Better Homes for Local People - The Mayor's Good Practice Guide to Estate Regeneration.docx (london.gov.uk)
London Plan Annual Monitoring Report 2021	London Plan AMR 16
London Datastore (live planning data)	Planning London Datahub - London Datastore
National Guidance	
National Planning Policy Framework (20 July 2021 version)	National Planning Policy Framework (publishing.service.gov.uk)
National Planning Practice Guidance (Living Draft, last changes 24 June 2021)	Planning practice guidance - GOV.UK (www.gov.uk)
National Design Guide (Living Draft, last changes 30 January 2021)	National design guide - GOV.UK (www.gov.uk)

Update 31/03/22