

London Borough of Richmond upon Thames

Local Housing Availability Assessment

February 2008

This paper sets out the housing land availability position in the London Borough of Richmond upon Thames, in order to provide supporting information for the Core Strategy Submission. The paper sets out the Housing Land Availability of known large sites in the borough and gives an estimate of where and how much housing is likely to take place in the Borough. The paper looks at sites in three categories: proposal sites; sites with permission; and other large sites. In addition to this it also looks at the Phasing of development and the Borough's small site allowance. The conclusion gives a broad range of housing for 5 areas of the borough.

Requirement for Housing Land Availability Assessment

Government guidance (PPS3 Housing) requires Strategic Housing Land Availability Assessments to be drawn up to show that the proposed future supply of housing can be delivered. Practice guidance on how to draw up these assessments was published in July 2007 alongside the Green Paper *Homes for the Future: more affordable, more sustainable*. However, it is not clear at what level these assessments should be carried out in the London context – whether for London as a whole, for the sub-regions or for individual boroughs. The current position as of February 2008 for the Strategic Housing Land Availability Assessment is that it will be carried out on a London wide basis by the Greater London Authority (GLA). The GLA have committed to carrying out the study in 2008/09¹ and the policy in the Core Strategy will have to be flexible enough to deal with any changes in housing targets.

Housing Allocation

The Borough has a housing target of 2700 units from 2007 to 2017. This equivalent to 270 units per annum. The 2005 London-wide Housing Capacity Study anticipated that during this period that:

- 951 units would come from large sites of ten or more units gross;
- 1706 from small sites; and
- 31 units would be in the form of non-self-contained accommodation (i.e. bedsits, bedspaces in care homes or hostels etc).

Study Methodology

To work out the figures for broad areas, the borough has been divided into 5 areas based on the ward boundaries as follows:

Twickenham – *Twickenham Riverside Ward; St Margaret's and North Twickenham Ward; South Twickenham Ward; West Twickenham Ward.*

Richmond – *Ham, Petersham and Richmond Riverside Ward; South Richmond Ward; North Richmond Ward; Kew Ward.*

East Sheen – *East Sheen Ward; Morlake and Barnes Common Ward; Barnes Ward.*

Whitton – *Whitton Ward; Heathfield.*

¹ See policy 3A.1 of the London Plan, Consolidated with Alterations since 2004, and GLA Briefing notes 2 and 32 to the EiP Panel into the further Alterations to the London Plan.

Teddington and Hampton – Hampton North Ward; Hampton Ward; Fulwell and Hampton Hill; Teddington Ward; Hampton Wick Ward.

The study looks at large sites within these areas under three headings:

1. Proposal sites
2. Large sites with permission
3. Other large sites

For sites with planning permission the total number of units proposed has been entered as the capacity. To estimate the capacity of sites without planning permission the density of the area proposed for housing has been worked out using the density matrix in the London Plan. The site areas were worked out (ha), along with which character they fell into from the density matrix, either Suburban, Urban or Central. Other known factors were also taken into account, such as whether the whole site was likely to be developed or only part. The density ranges in the London Plan Density Matrix were then applied to assume a broad range of indicative housing unit numbers for the site.

The figures are indicative for these sites without planning permission, and do not give a definitive number of units to be provided on the site. Planning applications on individual sites will have to take account of any other factors, such as other plan policies and land designations e.g. Conservation Areas.

Proposal Sites

Fourteen current proposal sites have been identified for housing:

Table 1: Current Proposal Sites

Site	Proposal Site	Address	Phase	No. Units	Progress as at Feb 2008
Platts Eyot	Yes Ref: H15	Off Lower Sunbury Road, Hampton	2007-12	70	Current on going application since 2005.
Hampton Water Treatment Works	Yes Ref: H1	Lower Sunbury Road	2012-17	25-55	Only part of the site likely to be developed as remainder is operational water treatment works. Whole site in Green Belt.
Nelson Primary School	Yes Ref:W3	Whitton	2012-17	10-28	Only part of the site to be developed for housing.
Richmond Station	Yes Ref: R6	The Quadrant, Richmond	2007-12	25-150	Site brief published. Only part of the site likely to come forward for housing due to mixed use development and operational requirements of railway and underground station.
Friars Lane Car Park	Yes Ref: R4	Richmond	2007-12	5-20	Site Brief Published
Terrace Yard	Yes Ref: R17	Richmond	2007-12	5-10	
Richmond College	Yes Ref: T29	Egerton Road, Twickenham	2007-12	10-30	Possible limited enabling development
Post Office Sorting Office	Yes Ref: T3	109 London Road, Twickenham	2007-12	30-170	Crane Valley Guidelines Apply. Mixed use development so only part of the site for housing.

Site	Proposal Site	Address	Phase	No. Units	Progress as at Feb 2008
Council Depot	Yes Ref: T14	Langhorn Drive, Twickenham	2007-12	25-55	Crane Valley Guidelines Apply
Twickenham Station	Yes Ref: T17	London Road, Twickenham	2007-12	25-75	Possible mixed use development so only part of the site for housing.
Twickenham Riverside	Yes Ref: T1	Embankment, Twickenham	2007-12	15-20	Site Brief out for consultation
TOTAL				245-683 Rounded = 200-700	

Sites With Planning Permission

Of large sites currently seventeen have permission, giving a range of housing units from 910 units. Most of these sites are expected to come forward in the 5 years from 2007-2012.

Table 2: Sites with planning permission

Site	Proposal Site	Address	Phase	No. Units	Progress as at Feb 2008
Craig House	No	Craig Road, Ham	2007-12	39	Under construction
Kent House	No	Richmond	2007-12	13	Planning permission granted
183-185 Lower Richmond Road	No	Richmond	2007-12	13	Planning permission granted
76 Lower Mortlake Road	No	Richmond	2007-12	10	Planning permission granted
179-181 Sheen Road	No	Richmond	2007-12	11	Planning permission granted
Central Service Station	No	Ham, Richmond	2007-12	10	Planning permission granted
Norcutt House	No	Twickenham	2007-12	20	Planning Permission granted
38 Twickenham Road	No	Twickenham	2007-12	14	Planning Permission granted
40 Cambridge Park	No	Twickenham	2007-12	14	Planning Permission granted
Air Sea House	No	Twickenham	2007-12	13	Planning Permission granted
Former Jewson's Ltd	No	4 Sandy Lane, Hampton Wick	2007-12	198	Under construction. Further planning application submitted, at appeal.
The Avenue Centre	No	Hampton Wick	2007-12	6	Planning permission granted as part of mixed use development.
113-117 Broad Lane	No	Hampton	2007-12	14	Completed August 2007
Beckets Wharf	No	Hampton Wick	2007-12	25	Planning permission granted

Site	Proposal Site	Address	Phase	No. Units	Progress as at Feb 2008
70 High Street	No	Teddington	2007-12	11	Planning permission granted
Allotment Site Vincam Close	No	Heathfield	2007-12	35	Planning Permission Granted
Powder Mill Land	No	Whitton	2007-12	14	Planning Permission Granted
Normansfield Hospital	Yes Ref:D1	Hampton Wick	2007-12	89	Planning permission granted Jan 2008
Kew Riverside	Yes Ref: K2	Strand Drive, Kew	2007-12	192	Completion due 2008
Richmond Lock	Yes Ref: T24	St Margarets Road	2007-12	172	Completion due 2009
TOTAL				913 units	

Other Large sites

Table 3: other large sites

Site	Proposal Site	Address	Phase	No. Units	Progress as at Feb 2008
Royal Star & Garter	No	Richmond Hill, Richmond	2007-12	25-55	Site brief in preparation. Existing user to relocate
Greggs Bakery	No	Gould Road, Twickenham	2007-12	75-200	Greggs Plan to relocate. Possible mixed use scheme.
Sainsbury's	No	Manor Road, Richmond	2007-12	60-255	Airspace development. Will be restricted by number storeys.
TOTAL				160 – 510 units Rounded = 150-500	

Small sites Allowance

The 2005 London wide Housing Capacity Study (HCS) gives each London borough a small sites allowance. The Borough small site allowance is 1706 units. Much of the boroughs development takes place on small sites due to the nature and character of the Borough. Much of the Borough is designated open space, such as Metropolitan Open Land, and there are 72 designated Conservation Areas and over 1100 Listed Buildings. These factors and others limited the number of large sites coming forward.

Phasing of Development

If divided evenly, the housing allocation would provide 1350 units in two five-year periods. However, there are likely to be more completions in the first five years as large sites are built out. In particular, two sites totalling 364 units had originally been expected to have been completed by March 2007. These are at Kew Riverside (192 units) and Richmond Lock (172 units), which are already under construction, but will not be fully completed until 2007/08 and 2009/10 respectively. A further site of 198 units should be completed at Sandy Lane, Hampton Wick, before 2012. There were 1192 units in the 2004-07 phase of the Housing Capacity Study. Of these 820 were completed by 31 March 2007. The remaining 372 will fall into the 2007-12 phase of completions and are identified above.

All large sites with planning permission in table 2 are deliverable, although the timing of the availability of some sites awaits the planned relocation of the existing user e.g. Star and Garter, Greggs Bakery. The sites for the 2007-12 period, if all were completed, would provide about 1300 units. (Planning permission has already been granted for 913 of these units). In addition, there would be a contribution from small sites which could be up to 850 over five years, if the estimate in the London Wide Housing Capacity Study is realised. (As at 1 April 2007 there were unimplemented planning permissions for 540 units on small sites of 1-9 units). This would bring the figure for the five year period to 2150, well in excess of the 1350 theoretically required.

Assuming all 2150 units were completed in the 2007-12 period, this would leave 550 units to fulfil the housing allocation in the remaining 2012-2017 period. Of these, 65 are currently anticipated on large sites. Overall the evidence has shown that the borough is on course to meet, and possibly exceed the 2007/08-2016/17 housing target.

Conclusions

An indicative broad range of housing by area is as follows (detailed tables are set out in appendix 1). This is based on large sites with an allowance for small sites of 1700 divided between the 5 areas:

Table 4: Broad Locations for housing

Area	Approx No of units to 2017 rounded to the nearest 100.
Richmond	700-1100
Twickenham	700-1100
Teddington & the Hamptons	700-800
Whitton	300
East Sheen	400

From this is clear that much of the development will take place within the central part of the Borough in the Richmond and Twickenham Areas. Much of the development in Twickenham will take place within the mixed use area of the Town Centre, where 3 large sites are identified and a further 3 large sites are just outside the mixed use area.

Overall the broad range of units on large sites is between 1250 units and 2105 units. In recent times, planning permissions on all sites have averaged 444² units per year. Although the numbers are likely to reduce in future, it seems most likely that the ten-year housing allocation will be achieved, and probably exceeded.

The figures and targets will be revised when the next London wide Housing capacity study is completed. At present the Greater London Authority (GLA) are due to commence this work in conjunction with London Boroughs in late 2008. A joint statement has been released by the GLA and GOL in relation to the 15 year housing supply, and is appended to the document (appendix 2).

² See UDP/ LDF Annual Monitoring Report 2006/07.

Appendix One: Large Sites by Area

Richmond Sites

Site	Proposal Site	Address	Phase	Approx No Units	Progress as at Feb 2008
Kew Riverside	Yes Ref: K2	Strand Drive, Kew	2007-12	192	Completion due 2008
Royal Star & Garter	No	Richmond Hill, Richmond	2007-12	25-100	Site brief in preparation. Existing user to relocate
Craig House	No	Craig Road, Ham	2007-12	39	Under construction
Richmond Station	Yes Ref: R6	The Quadrant, Richmond	2007-12	25-150	Site brief published
Kent House	No	Richmond	2007-12	13	Planning permission granted
183-185 Lower Richmond Road	No	Richmond	2007-12	13	Planning permission granted
76 Lower Mortlake Road	No	Richmond	2007-12	10	Planning permission granted
179-181 Sheen Road	No	Richmond	2007-12	11	Planning permission granted
Friars Lane Car Park	Yes Ref: R4	Richmond	2007-12	5-20	Site Brief Published
Central Service Station	No	Ham, Richmond	2007-12	10	Planning permission granted
Terrace Yard	Yes Ref: R17	Richmond	2007-12	5-10	
Sainsbury's	No	Manor Road, Richmond	2007-12	60-255	Airspace development. Number of units will depend on storeys.
TOTAL				408-823 units Rounded = 400-800	

Twickenham Sites

Site	Proposal Site	Address	Phase	No Units	Progress as at Feb 2008
Richmond Lock	Yes Ref: T24	St Margarets Road	2007-12	172	Completion due 2009
Twickenham Rugby Stadium	Yes Ref: W1	Rugby Road, Twickenham	2007-12	25-60	Site area enlarged, but Planning permission granted for 24.
Greggs Bakery	No	Gould Road, Twickenham	2007-12	35-100	Greggs Plan to relocate. Possible mixed use scheme.
Richmond College	Yes Ref: T29	Egerton Road, Twickenham	2007-12	10-30	Possible limited enabling development
Post Office Sorting Office	Yes Ref: T3	109 London Road, Twickenham	2007-12	30-170	Crane Valley Guidelines Apply
Council Depot	Yes Ref: T14	Langhorn Drive, Twickenham	2007-12	25-55	Crane Valley Guidelines Apply
Twickenham Station	Yes Ref: T17	London Road, Twickenham	2007-12	25-75	
Twickenham Riverside	Yes Ref: T1	Embankment, Twickenham	2007-12	15-20	Site Brief out for consultation
Norcutt House	No	Twickenham	2007-12	20	Planning Permission granted
38 Twickenham Road	No	Twickenham	2007-12	14	Planning Permission granted
40 Cambridge Park	No	Twickenham	2007-12	14	Planning Permission granted
Air Sea House	No	Twickenham	2007-12	13	Planning Permission granted
TOTAL				398-743 units Rounded =400-750	

Teddington & Hamptons

Site	Proposal Site	Address	Phase	No. Units	Progress as at Feb 2008
Former Jewson's Ltd	No	4 Sandy Lane, Hampton Wick	2007-12	198	Planning permission granted
Platts Eyot	Yes Ref: H15	Off Lower Sunbury Road, Hampton	2007-12	70	Current application
Beckets Wharf	No	Hampton Wick	2007-12	25	Planning permission granted
113-117 Broad Lane	No	Hampton	2007-12	14	Completed August 2007
The Avenue Centre	No	Hampton Wick	2007-12	6	Part of mixed use development. Planning permission granted.
70 High Street	No	Teddington	2007-12	11	Planning permission granted
Normansfield Hospital	Yes Ref:D1	Hampton Wick	2007-12	89	Planning permission granted
Hampton Water Treatment Works	Yes Ref: H1	Lower Sunbury Road	2012-17	25-55	
TOTAL				438-468 units Rounded =400-475	

Whitton Sites

Site	Proposal Site	Address	Phase	No. Units	Progress as at Feb 2008
Allotment Site Vincam Close	No	Heathfield	2007-12	35	Planning Permission Granted
Powder Mill Land	No	Whitton	2007-12	14	Planning Permission Granted
Nelson Primary School	Yes Ref:W3	Whitton	2012-17	10-28	
TOTAL				59-77 units Rounded = 50-80 units	

East Sheen

Site	Proposal Site	Address	Phase	No. Units	Progress as at Feb 2008
Currently no large sites identified in East Sheen area.					

Appendix Two: Joint Statement by GLA and GOL

Addressing PPS3 requirements for a 15-year housing land supply (Interim Approach)

Statement from Government Office for London and the Greater London Authority

The Issue

1. National planning policy set out in Planning Policy Statement 3¹ states *“Local Planning Authorities should set out in Local Development Documents (LDD) their policies and strategies for delivering the level of housing provision, including identifying broad locations and specific sites that will enable continuous delivery of housing for 15 years from the date of adoption, taking into account the level of housing provision set out in [the London Plan]”*² (see paragraph 5 below). It says Local Planning Authorities *“should consider the extent to which emerging LDDs... can have regard to the policies in this statement whilst maintaining plan making programmes”*³.
2. A comprehensive and robust pan-London assessment of housing capacity was undertaken in 2004⁴ and provides the basis for housing targets in the London Plan to 2016/17⁵. These targets were subject to an Examination in Public and published in an Early Alteration to the Plan in 2006. The approach to housing capacity was also assessed with regard to PPS3 at an Examination in Public into the draft Further Alterations to the London Plan in 2007. At this EIP the Mayor restated the commitment made in the Early Alterations to review housing capacity before 2011. The Panel noted this and recommended that the Mayor produce guidance on *“how boroughs should derive indicative figures for housing provision in the period 2016 to 2026 for the purpose of LDDs during the interim period”*⁶.
3. The GLA and GOL have been working together to provide joint advice to boroughs that will meet the PPS3 policy requirement in a reasonable, integrated and pro-active way and avoid boroughs undertaking unnecessary, uncoordinated and costly additional work. The advice in this note sets out the approach boroughs should take in the interim (prior to the publication of a new study and review of London Plan housing targets). It also outlines the longer term approach. This note has been sent to the Planning Inspectorate and Communities and Local Government, and the authors are happy to discuss the matter further with ALBPO and other stakeholders.

Current Position

4. In London there is a strong tradition of London-wide studies to provide robust evidence on housing land supply and capacity. This strategic approach ensures consistency across boroughs, avoids unnecessary duplication of resources and is the most appropriate level at which to assess capacity in the unique circumstances of the London housing market.
5. London currently has an authoritative and robust assessment of housing capacity (2004 Housing Capacity Study, HCS), based on capacity of individual large sites and justified assumptions on small sites for the ten-year period 2007/8 – 2016/17. PPS3, however, has set out a requirement for LDDs to demonstrate a 15-year supply of land for housing from date of adoption. This would draw on information from a Strategic Housing Land Availability Assessment⁷ (SHLAA) and/or other relevant evidence⁸ to identify deliverable sites for the first five years, and developable sites for years 6-10 as well as, where possible, years 11-15⁹. In addressing the unique circumstances of London it could also incorporate assumptions on small sites and windfalls as set out in PPS3¹⁰ and SHLAA Guidance Notes¹¹. The Mayor is already committed to undertaking a new Housing Capacity/Strategic Housing Land Availability Assessment for boroughs to draw on. However, until the results from the new study are finalised, there is a transition period where boroughs may be anxious that they could be open to challenge on the tests of soundness.

Interim Approach

6. The Further Alterations to the London Plan (FALP) EIP Panel considered the 15 year supply issue. The Panel accepted the Mayor's proposal¹² set out in his Briefing Notes 2 'Housing Provision after 2016/2017'¹³ and, more particularly, 32 'Additional Note on Matter 6.4, question 1'¹⁴. This essentially states that for boroughs to demonstrate that they have identified a 15 year land supply in terms of the objectives of PPS3 and in the distinct circumstances of London, they should roll forward their annual London Plan minimum ten year housing targets (2007/8 – 16/17) to cover the required 15 year period rather than undertaking individual SHLAAs.
7. Briefing Note 2 explains that although the 2004 HCS had a twenty-year timeframe, it does not provide a robust estimate of capacity for the period beyond 2016/17. Indeed, it was not designed to do so¹⁵. The study clearly states that: *capacity allocated to Phase 4 [2016/17-2026/27] is a potential but not a predicted source of new housing*. The briefing note further clarifies that potential capacity from this period will be updated.
8. Briefing Note 2 recognises that, in the context of London's highly pressurised land market, almost all development comes from recycling previously developed land. The note stated that it was difficult to try and look forward more than ten years and results beyond this horizon tend to lack certainty and the essential robustness to meet London's future needs.
9. Briefing Note 32 goes on to make clear that *"it may therefore be considered reasonable for the Mayor to offer the kind of guidance envisaged in PPS3 by recommending that the boroughs should project the figure that is in their existing target forward to 2020 – but NOT as a target, merely as an indicative figure. This would need to contain the strong caveat that these will have to be checked and adjusted as necessary against a new Housing Capacity Study"*.
10. The Mayor indicated at the EIP that he agreed with the Panel that boroughs will need to roll forward their targets beyond 2020. This is now reflected in the recently published London Plan, Policy 3A.1, which forms part of the development plan¹⁶.

Longer-term Approach

11. The interim approach set out above is intended to provide the most robust approach to identification of a fifteen year supply of housing land based on the recently published targets and 2004 HCS, and until a new study is completed to inform review of London Plan housing targets.
12. The 2004 HCS underpinning current targets was exceptionally rigorous and appropriate to the unique circumstances of London. A new study will need to maintain this approach while addressing the policy objectives of PPS3¹⁷. The Mayor has committed to coordinating a new pan-London Housing study, which will be undertaken in these terms to inform review of housing targets in accordance with Policy 3A.1 of the London Plan. Work on this has already commenced and a draft paper proposing refinements to the previous methodology will be circulated as soon as possible.

March 2008

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- ¹ Published by Communities and Local Government in November 2006.
- ² PPS3, Paragraph 53
- ³ PPS3, Paragraph 6
- ⁴ 2004 London Housing Capacity Study available at http://www.london.gov.uk/mayor/planning/capacity_study/index.jsp
- ⁵ The London Plan (Consolidated with Alterations Since 2004)
- ⁶ Panel Report p159 – 160: <http://www.london.gov.uk/mayor/strategies/sds/eip-report07/index.jsp>
- ⁷ Communities and Local Government published practice guidance (July 2007) on how to carry out SHLAAs (CLG, Strategic Housing Land Availability Assessments Practice Guidance. TSO, 2007).
- ⁸ PPS3, Paragraph 54.
- ⁹ PPS3, Paragraph 55.
- ¹⁰ PPS3, Paragraph 59.
- ¹¹ CLG, Strategic Housing Land Availability Assessments Practice Guidance. TSO, 2007
- ¹² Panel Report p159 – 160: <http://www.london.gov.uk/mayor/strategies/sds/eip-report07/index.jsp>
- ¹³ <http://www.london.gov.uk/london-plan-eip/docs/briefings/housing.pdf>
- ¹⁴ http://www.london.gov.uk/london-plan-eip/docs/briefings/bn32_glanoteonmatter6-4.pdf
- ¹⁵ Mayor of London, London Housing Capacity Methodology Study. GLA, 2003. (Page 29), available at http://www.london.gov.uk/gla/publications/planning.jsp#hc_meth
- ¹⁶ Policy 3A.1, the London Plan, Consolidated with Alterations Since 2004 (February 2008).
- ¹⁷ Policy 3A.2, the London Plan, Consolidated with Alterations Since 2004 (February 2008).