

63 – 71 HIGH STREET, HAMPTON HILL TW12 1NH

**PLANNING, DESIGN AND ACCESS STATEMENT
IN SUPPORT OF
PLANNING AND CONSERVATION AREA CONSENT APPLICATIONS
FOR THE REDEVELOPMENT OF THE SITE TO PROVIDE
39 RESIDENTIAL UNITS AND 234M2 OF RETAIL FLOOR SPACE
TOGETHER WITH ANCILLARY BASEMENT CAR PARK, LANDSCAPING ETC.**

ON BEHALF OF GREATPLANET LIMITED

NOVEMBER 2016

**WEST & PARTNERS
127 METAL BOX FACTORY
30 GREAT GUILDFORD STREET
LONDON SE1 0HS**

1.0 INTRODUCTION

- 1.1 This is a classic 'Brownfield' opportunity site which is situated in the Hampton Hill High Street Conservation Area.
- 1.2 It is situated to the west side of the High Street which, particularly as it extends to the north, is an established local centre providing a wide range of shops and services.
- 1.3 The vision for Hampton Hill is of a thriving local centre with a range of facilities to meet local needs including a good balance of residential accommodation.
- 1.4 The site, which comprises a net area of 0.2528ha, is largely rectangular, with a frontage to the street of c.41m and is c.70m deep. The west boundary abuts the private roadway which provides access to the St Clare Business Centre off Holly Road. There is no access to the site from this private roadway.
- 1.5 The High Street frontage is currently developed with two office buildings, (the northern dating from c.1970 and the southern c.1980's). The southern building incorporates three self-contained residential flats on the top floor. A third building is located in the south west corner of the site next to the access road to the St Clare Business Park.
- 1.6 The buildings have been largely vacant from 3 to 8 years (the southern building since December 2008 the northern building since September 2013) and were marketed separately and then together for continued office use from December 2008 until February 2015 before being acquired by the applicant Greatplanet Limited. Details of the marketing are set out in the attached report ([Appendix 4](#)) prepared by Bonsors – chartered surveyors. As this sets out, the buildings were offered as a whole and on floors and part floor basis, with the asking rent levels quoted at £12 per sq. ft. with flexible lease terms.
- 1.7 By notice dated 20th October 2016 Prior Approval was issued by the Council for the change of use of the existing buildings from B1 offices to provide 23, C3 residential dwellings in addition to the three existing retained flats in the southern building.
- 1.8 Architecturally, none of these buildings make a positive contribution to the character of the Conservation Area nevertheless it is important to recognise but that the two buildings on the High Street are of a scale and mass that is generally greater than the neighbouring development and that this is a material consideration in looking at the scale and form of the proposed new building..
- 1.9 On the High Street the buildings are set back from the historic building line and are separated by a gated vehicular access, roughly central in the frontage: this is bridged at the upper level uniting the buildings. The vehicular access leads to a large area of surface parking to the rear, with 49 bays.
- 1.10 There are seven trees within the parking area of the site all of which are in a poor condition with one having died. (see Arboricultural Survey and Report attached as [Appendix 5](#)).
- 1.11 A bus stop and double length standing bay is situated on the highway to the front of the site. The site is c.1 mile from Hampton and Fulwell mainline train stations. In terms of public transport accessibility, the site has a PTAL rating of 2. (see Transport Statement [Appendix 3](#)).
- 1.12 Opposite is The Star Public House with its adjoining surface car park which is bounded by the wall enclosing the neighbouring Bushy Park. Today the Star is the southerly extent of development on the east side of the High Street although historic maps show development continuing to the south. (see Fig 9 of the Archaeological Desk Top Assessment [Appendix 6](#)).
- 1.13 To the west is the St Clare Business Park. This is identified as a proposal site for mixed use development in the Site Allocation Plan

- 1.14 To the south is the tall, three story, relatively modern development known as The Mews. This terrace of eight properties was originally designed for office use. Six of these have now been converted to residential use pursuant to permitted development prior approval decisions. This terrace sits tight against south boundary of the site and is in terms of amenity a bad neighbour to the application site.
- 1.15 To the north there is a pair of properties on the street frontage while to the rear is the recently completed development of a terrace of four, three story town houses with surface parking.
- 1.16 A detailed assessment of the context of the site and its role in the Conservation Area is set out in the Architectural Design Statement (Appendix 1). This examines existing use and building forms and the massing of the immediate and wider area.
- 1.17 From this analysis we conclude that despite the proximity of Bushy Park to the east the overall character of the High Street is Urban, with a medium grain evidenced by plot and gap widths and a wide variety of roof types and a mix of facing materials and architectural styles.

2.0 PROPOSAL

- 2.1 The applications are for Conservation Area Consent for the demolition of the existing buildings and a detailed Planning Permission for the erection of an interlinked group of buildings, on the east half of the site, set around a pedestrian entrance court accessed off the High Street and a grouping of town houses, on the west half of the site, set around a landscaped garden court accessed from the eastern entrance court.
- 2.2 The group of buildings around the entrance court front the High Street in two elements (southern and northern) and comprising ground and part one, part two, main upper floors with a set-back third level in the form of an articulated roof storey. There are three separate entrances and cores off the entrance court providing access to the 16, two-bedroom, 12, one-bedroom and 3 studio apartments. On the street frontage, there will be two non-residential units on the ground floor. The unit in the northern element comprises 102m² and that in the southern element comprise 131.5m². Both units have return frontages which extend into the entrance court. While it is expected that these will be occupied as A1(non-food) retail the application seeks permission for the northern unit to also be granted permission for use as A3 café: B1 office and D1 (limited to clinics / crèche / non-residential education and training centres).
- 2.3 The 8 three-bedroom town houses on the west half of the site comprise two main floors with a set-back top floor. These properties will also have additional accommodation within the basement for use as ancillary general utility space.
- 2.4 A full basement providing 45 allocated car parking spaces, including 10% sized for blue badge holders and a minimum of 20% with access to electric charging points together with 65 secure cycle storage stands for residential occupiers and 2 Sheffield Stands for employees of the non-residential ground floor units; refuse stores and plant rooms. The basement will be accessed via a gated ramp off the south of the High Street frontage. Each core serving the apartments and each house provide direct access to the parking spaces and other facilities.
- 2.5 The Architectural Design Statement (Appendix1) provides further details of the layouts, connections, proposed materials etc.

3.0 THE TOWN PLANNING FRAMEWORK

3.1 Set out below are the relevant planning policies and guidance which need to be weighed and balanced in the determination of any application. Sections of policies on which the applicant rely in promoting this proposal are set out in bold type face.

3.2 The principles of the need for policy balance in decision making are usefully set out in *Peremps Investments Limited - v - Secretary of State for Communities and Local Government Solihull Metropolitan Borough Council* [2015] EWHC 2308 (Admin). This states that when making a decision the decision maker must:

"consider the development plan, identify any provisions in it which are relevant to the question before him and make a proper interpretation of them". The decision "will be open to challenge if he fails to have regard to a policy in the development plan which is relevant to the application or fails properly to interpret it"

NATIONAL POLICY

3.3 The National Planning Policy Framework introduced in March 2012 sets out the Government's planning policies for England and how these are expected to be applied.

3.4 The Government has determined that the purpose of the planning system is to contribute to the achievement of sustainable development, which has three dimensions: economic, social and environmental (Para 7). The planning system is therefore expected to perform a number of roles, one of which is:

"a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being."

3.5 There is an undeniable and unfulfilled need for additional housing in London as evidenced from the conclusions of the Inspector's report to the Mayor (December 2014) on his findings following the EiP of the proposed Further Alterations to the London Plan [FALP]. This is embodied in the current London Plan. All indicators point to the current review being undertaken by GLA concluding that the current targets need to be adjusted upwards by a considerable degree to meet objectively identified need. Most recently in the Mayor's October 2016 consultation document 'A City for all Londoners' the anticipated minimum annual needs figure is put at a minimum of 50,000: a c.20% increase on existing targets.

3.6 At paragraph 14 the Framework advises, inter alia:

"At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision taking."

For decision taking this means:

- Approving development proposals that accord with the development plan without delay; and***
- Where the development plan is absent, silent or relevant policies are out of date, granting permission unless:***
- Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole;"***

3.7 The scheme is sustainable. It proposes carbon efficient construction, demonstrating proper and proportionate utilisation of scarce land resource in an area well served with retail outlets, schooling, social and other community facilities. As a consequence, it will not result in adverse

impacts which outweigh the contribution it will make to meeting Richmond's and London's identified housing need.

3.8 In respect of the overarching role that the planning system ought to play, the Framework sets out (Para 17) 12 core land use planning principles which should underpin both plan making and decision taking. Those most relevant to the proposal are:

- **“not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives;**
- **proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take into account market signals, such as land process and housing affordability, and set a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities;**
- **always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;**
- **support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources....;**
- **encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided it is not of high environmental value;**
- **actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable;”**

3.9 In respect of delivering a wide choice of high quality homes, the Framework advises (Para 47), inter alia:

- “To boost significantly the supply of housing, local planning authorities should:**
- **use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework....;**
 - **identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5%.....to ensure choice and competition in the market for land.**
- Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20%.....to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;*
- *identify a supply of specific, developable sites or broad locations for growth, for years 6- 10 and, where possible, for years 11-15;*

3.10 Footnotes to paragraph 47 state, inter alia:

“To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable”

and

“To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged”

3.11 Paragraph 49 states:

“Housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be

considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites.”

- 3.12 The site is available now and the proposal represents a sustainable development which is viable and deliverable. The London Plan expects supply of new housing to exceed projections wherever and whenever possible. Furthermore, the published Annual Monitoring reports of the GLA show that delivery of new housing is still significantly below the overall planned annual target across London. In light of this the presumption in favour of this highly sustainable development should be given significant weight.
- 3.13 In requiring good design the Framework advises (Para 56, 60, 63):
- “The Government attaches great importance to the design of the built environment **Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute to positively making places better for people.**”*
- “Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness.”*
- “In determining applications, great weight should be given to outstanding or innovative designs which help raise the standard of design more generally in the area.”*
- 3.14 The proposals have been developed to have specific regard to these requirements
- 3.15 In respect of promoting healthy communities the Framework advises (Para 69, 73, 74), inter alia:
- “Planning policies and decisions, in turn, should aim to achieve places which promote:*
- safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion;*
 - safe and accessible developments, containing clear and legible pedestrian routes, and high*
- 3.16 The design delivers a safe and accessible environment with clear legible routes and high quality space.
- 3.17 In respect of meeting the challenge of climate change the framework advises (Para 96), inter alia:
- “In determining planning applications, local planning authorities should expect new development to:*
- comply with adopted Local Plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type development involved and its design, that this is not feasible or viable; and*
 - take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.”*
- 3.18 As set out in the Architectural Design Statement, the siting, layout and orientation of the building is designed to maximise the amenity of future residents while minimising energy needs and as set out further in the accompanying Energy and Sustainability Assessments (Appendix 7 and Appendix 8a / 8b) the development meets the required minimum standards.

- 3.19 In respect of conserving and enhancing the natural environment the Framework advises (Para 120), inter alia:

“To prevent unacceptable risks from pollution and land instability, planning policies and decisions should ensure that new development is appropriate for its location. The effects (including cumulative effects) of pollution on health, the natural environment and general amenity, and the potential sensitivity of the area or proposed development to adverse effects from pollution, should be taken into account....”

- 3.20 These issues are addressed in the accompanying Preliminary Ecological Assessment (Appendix9a & 9b); Geoenvironmental Contamination Assessment (Appendix10a); Basement Impact Assessment (Appendix10b); Noise Assessment (Appendix12) and Air Quality Assessment (Appendix13). These each demonstrate that there is no reason for the development not to be approved for reasons of pollution or impacts on health, the natural environment, or general amenity.

- 3.21 In respect of conserving and enhancing the historic environment the Framework advises (Para 131), inter alia:

“In determining planning applications, local planning authorities should take account of:

• the desirability of new development making a positive contribution to local character and distinctiveness”

- 3.22 The scheme has been specifically developed to enhance the character of the Hampton Hill CA. and make a long term distinctive and positive contribution.

- 3.23 In respect of using a proportionate evidence base to ensure viability and deliverability the Framework advises (Para 173), inter alia:

“Pursuing sustainable development requires careful attention to viability and costs in plan making and decision taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.”

The viability of the proposed development is addressed in the submitted Viability Assessment Report (Appendix14).

THE LONDON PLAN - Regional Policy

- 3.24 While not a development which will be referable to the Mayor, the London Plan (Consolidated with Alterations since 2011 – March 2016) is the strategic plan which sets the integrated economic, environmental, transport and social framework for the development of London. All Local Plans adopted by the London Boroughs need to be in conformity with the London Plan and the policies are therefore relevant in the determination of this application.

- 3.25 Of particular relevance is the need for new homes for Londoners. In January 2014 the Mayor published Draft Further Alterations to the London Plan (FALP). The further alterations were primarily prepared to address the housing and employment issues emerging from an analysis of census data released in the period following the adoption of the London Plan in July 2011 and the Revised Early Minor Alterations in October 2013. The census indicated a marked increase in London’s population and the alterations looked to address this by a marked shift upwards in the annual housing targets the London Boroughs were required to meet.

- 3.26 Following the Examination in Public (EiP) of FALP and consideration of the Inspectors report the revisions to the London Plan set new targets for housing supply (Table 3.1) at 42,389 dwellings per year and at 315 dwellings per year in Richmond.
- 3.27 **The Plan confirms that London should continue to be considered as a single housing market and places a duty on each of the London Councils to seek to exceed the minimum housing supply targets and seek to enable additional development capacity to be brought forward to supplement these targets (Policy 3.3)**
- 3.28 In this respect Paragraph 3.16b is particularly relevant stating:
- “This level of household growth does not represent the growth in housing requirements over the life of the Plan. This is identified through the GLA’s SHMA which draws on government guidance to identify London’s need for both market and affordable housing. As well as demographic trends the SHMA reflects the Mayor’s intention to seek to address the existing backlog in housing need and takes account of the range of factors which bear on this. **On this basis, the central projection in the SHMA indicates that London will require between approximately 49,000 (2015-2036) and 62,000 (2015-2026) more homes a year.** This range incorporates different levels of population change over the period, the time taken to address current need (backlog) and the anticipated under delivery between 2011 and 2015. **The 2015-2036 figure of 49,000 additional homes a year provides the basis for the detailed housing need figures set out in this Plan. In light of the projected higher need, especially at the start of the plan period, this figure should be regarded as a minimum.**”*
- 3.29 The urgent need to increase housing supply in London is a material consideration in the determination of this proposal and should therefore be given significant weight.
- 3.30 The policies of the London Plan which also have to be weighed and balanced in the determination of this proposal are listed below in Table 1.

Table 1

Policy	Title
3.3	Increasing housing supply
3.4	Optimising housing potential
3.5	Quality and design of housing developments
3.8	Housing choice
3.9	Mixed and balanced communities
3.12	Negotiating affordable housing on individual private residential and mixed use schemes
5.2	Minimising carbon dioxide emissions
5.3	Sustainable design and construction
5.7	Renewable energy
5.12	Flood risk management
5.13	Sustainable drainage
5.21	Contaminated Land
6.1	Strategic Approach
6.9	Cycling
6.10	Walking
6.13	Parking
7.1	Building London’s neighbourhoods and communities
7.2	An Inclusive Environment
7.3	Designing out crime
7.4	Local character
7.5	Public Realm
7.6	Architecture
7.14	Air Quality
7.15	Reducing noise
8.2	Planning Obligations
8.3	Community Infrastructure Levy

- 3.31 In respect of increasing housing supply Policy 3.3 states, inter alia:
- “D. Boroughs should seek to achieve and exceed the relevant minimum borough annual average housing target in Table 3.1.....”***
- and at
- “Da. Boroughs should draw on the housing benchmarks in table 3.1 in developing their LDF housing targets, augmented where possible with extra housing capacity to close the gap between identified housing need and supply in line with the requirement of the NPPF”***
- 3.32 Subsection E of Policy 3.3 states:
- “Boroughs should identify and seek to enable additional development capacity to be brought forward to supplement these targets having regard to the other policies of this Plan and in particular the potential to realise brownfield housing capacity through the spatial structure it provides including:***
- a. intensification (see policies 2.13, 3.4)*
- d. mixed use redevelopment, especially of surplus commercial capacity and surplus public land, and particularly that with good transport accessibility (see policies 2.7, 2.11, 4.2-4.4)*
- e. sensitive renewal of existing residential areas, especially in areas of good public transport accessibility (see policies 3.4, 3.5, 3.14).*
- 3.33 Subsection F of Policy 3.3 states:
- “Boroughs must identify new, and review existing housing sites for inclusion in LDFs”.***
- 3.34 The target for Richmond set out in Table 3.1 is a minimum of 315 per annum. However, to be consistent with the requirement of paragraph 47 of the NPPF this figure has to be increased with an additional buffer of 5%.....to ensure choice and competition in the market for land. This increases the annual target to 330.
- 3.35 The proposed development will make a 12% contribution to meeting the annual target for housing supply which is itself a minimum requirement.
- 3.36 In respect of optimising housing potential Policy 3.4 states, inter alia:
- “A. Taking into account local context and character, the design principles in Chapter 7 and public transport capacity, development should optimise housing output for different types of location within the relevant density range shown in Table 3.2.....”***
- 3.37 The review of the setting of the site set out in the Architectural Design Statement, (Appendix 1) concludes that the context is urban but, because of the method of assessing PTAL, as discussed in the Transport Statement (Appendix 3) it only has a PTAL of 2. The design responds to this at a density of 154 u/ha which is within the band 70 – 170 u/ha set for 2.7 - 3.0hr/unit (the average for the scheme being 2.9hr/unit) by Table 3.2.
- 3.38 In respect of the quality and design of housing developments Policy 3.5 states, inter alia:
- “B. The design of all new housing developments should enhance the quality of local places, taking into account physical context; local character; density; tenure and land use mix; and relationships with, and provision of, public communal and open spaces, taking particular account of the needs of children and older people.***
- 3.39 In respect of housing choice Policy 3.8 states, inter alia:
- “B.....boroughs should work with the Mayor and local communities to identify the range of needs likely to arise within their areas and ensure that:***

- a. new developments offer a range of housing choices, in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups and the changing roles different sectors, including the private rented sector, in meeting these
- b. provision of affordable family housing is addressed as a strategic priority in LDF policies
- c. all new housing is built to 'The Lifetime Homes' standards
- d. ten per cent of new housing is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users.....”

3.40 The design of the residential units meets the Mayor’s standards and the provisions for housing choice as set out in Policy 3.8. The Architectural Design Statement (Appendix 1); provides details of the floor areas.

3.41 In respect of mixed and balanced communities Policy 3.9 states, inter alia:

“A. Communities mixed and balanced by tenure and household income should be promoted across London through incremental small scale as well as larger scale developments which foster social diversity, redress social exclusion and strengthen communities’ sense of responsibility for, and identity with, their neighbourhoods. They must be supported by effective and attractive design, adequate infrastructure and an enhanced environment....”

The proposal accords fully with this policy.

3.42 In respect of negotiating affordable housing Policy 3.12 states, inter alia:

- “A. The maximum reasonable amount of affordable housing should be sought when negotiating on individual private residential and mixed use schemes, having regard to:***
- a. current and future requirements for affordable housing at local and regional levels...*
 - b. affordable housing targets adopted.....*
 - c. the need to encourage rather than restrain residential development***
 - d. the need to promote mixed and balanced communities*
 - e. the size and type of affordable housing needed in particular locations*
 - f. the specific circumstances of individual sites.*

B. Negotiations on sites should take account of their individual circumstances including development viability.....”

The submitted Viability Assessment (Appendix14) shows that the proposal does not generate a sufficient developers profit margin, against accepted industry benchmarks, to finance on-site provision of affordable housing. Nevertheless, Greatplanet Limited, the applicant and unencumbered owner of the site is proposing to proceed with the redevelopment as a brand leading exemplar for contemporary urban living and as a long term investment in its portfolio. Greatplanet are proposing to incorporate four Starter Homes in line with the provisions of the Housing and Planning Act 2016.

3.43 In respect of minimising carbon dioxide emissions Policy 5.2 states, inter alia:

“A. Development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following hierarchy:

- 1. Be lean: use less energy*
- 2. Be clean: supply energy efficiently*
- 3. Be green: use renewable energy.”*

The Energy Statement (Appendix7) demonstrates that the design is focused on enhanced passive design measures and incorporates active design measures to reduce energy consumption and CO₂ emissions. The demand reduction measures included in the scheme are:

- Enhanced fabric efficiency of the building envelope
- Air tightness better than Part L 2013 standards
- High efficiency lighting systems
- Highly efficient plant and systems

It concludes that 35.2% of CO₂ will be displaced from current Building Regulations – Part L 2013 requirements.

- 3.44 In respect of sustainable design and construction Policy 5.3 states, inter alia:
- “A. The highest standards of sustainable design and construction should be achieved in London to improve the environmental performance of new developments and to adapt to the effects of climate change over their lifetime.*
- B. Development proposals should demonstrate that sustainable design standards are integral to the proposal, including its construction and operation, and ensure that they are considered at the beginning of the design process.”*
- 3.45 The design adopts the principles of sustainability in choice of materials and detailing and with the proposed integrated roof PV cells the development will reduce carbon emissions to below the current target levels.
- 3.46 In respect of assessing effects of development on transport capacity Policy 6.3 states, inter alia:
- “A. Development proposals should ensure that impacts on transport capacity and the transport network, at both corridor and local level, are fully assessed. Development should not adversely affect safety on the transport network.”*
- 3.47 In respect of cycling Policy 6.9 states, inter alia:
- “B. Developments should:*
- a. Provide secure, integrated convenient and accessible parking facilities in line with the minimum standards set out Table 6.3.....”*
- 3.48 In respect of walking Policy 6.10 states, inter alia:
- “B. Development proposals should ensure that high quality pedestrian environments and emphasise the quality of the pedestrian and street space.”*
- 3.39 In respect of parking Policy 6.13 states, inter alia:
- “C. The maximum standards set out in the Table 6.2 in the Parking Addendum to this chapter should be the basis for to planning applications.*
- D. In addition, developments must:*
- a. ensure that 1 in 5 spaces (both active and passive) provide an electrical charging point to encourage the uptake of electric vehicles*
- b. provide parking for disabled people in line with Table 6.2.....”*
- 3.40 The proposal is designed to be in compliance with these policies. The detailed assessment is set out in more detail in the accompanying Transport Statement (Appendix3).
- 3.41 In respect of Lifetime Neighbourhoods, Policy 7.1 states, inter alia:
- “B. Development should be designed so that the layout, tenure, and mix of uses interface with surrounding land and improve people’s access to social and community infrastructure (including green spaces), the Blue Ribbon Network, local shops, employment and training opportunities, commercial services and public transport.*
- C. Development should enable people to live healthy, active lives; should maximize the opportunity for community diversity, inclusion and cohesion; and should contribute to people’s sense of place, safety and security. Places of work and leisure, streets, neighbourhoods, parks and open spaces should be designed to meet the needs of the community at all stages of people’s lives, and should meet the principles of lifetime neighbourhoods.*
- D. The design of new buildings and the spaces they create should help reinforce or enhance the character, legibility, permeability and accessibility of the neighbourhood.”*

3.42 Policy 7.2 – An Inclusive Environment states, inter alia:

“A The Mayor will require all new development in London to achieve the highest standards of accessible and inclusive design and supports the principles of inclusive design which seek to ensure that developments:

a can be used safely, easily and with dignity by all regardless of disability, age, gender, ethnicity or economic circumstances

b are convenient and welcoming with no disabling barriers, so everyone can use them independently without undue effort, separation or special treatment

c are flexible and responsive taking account of what different people say they need and want, so people can use them in different ways

d are realistic, offering more than one solution to help balance everyone’s needs, recognising that one solution may not work for all.

C Design and access statements submitted with development proposals should explain how, following engagement with relevant user groups, the principles of inclusive design, including the specific needs of older and disabled people, have been integrated into the proposed development, whether relevant best practice standards such as British Standard BS 8300:2009+ A1:2010 have been complied with, and how inclusion will be maintained and managed.

3.43 Policy 7.3 In respect of Designing Out Crime states, inter alia:

“B. Development should reduce the opportunities for criminal behaviour and contribute to a sense of security without being overbearing or intimidating.....”

3.44 The scheme meets the relevant objectives of these policies. It is designed to the best inclusive and accessible standards.

3.45 In respect of Local Character Policy 7.4 states, inter alia:

“B. Buildings, streets and open spaces should provide a high quality design response that:

a. Has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass

b. Contributes to a positive relationship between the urban structure and natural landscape features, including the underlying landform and topography of an area

c. Is human in scale, ensuring buildings create a positive relationship with street level activity and people feel comfortable with their surroundings.....”

3.46 The proposal responds positively to these requirements in terms of its design (massing, orientation, scale and proportion) and in the manner in which it responds to and forms a coherent urban composition.

3.47 Policy 7.5 addresses the Public Realm. Paragraph 7.16 is relevant, this states:

“The quality of the public realm has a significant influence on quality of life because it affects people’s sense of place, security and belonging, as well as having an influence on a range of health and social factors. For this reason, public and private open spaces, and the buildings that frame those spaces, should contribute to the highest standards of comfort, security and ease of movement possible. This is particularly important in high density development (Policy 3.4). Open spaces include both green and civic spaces, both of which contribute to the provision of a high quality public realm (see Policy 7.18). The character of the public realm that leads into major green spaces, especially for pedestrians is key to the integrating of green infrastructure and landscape into the urban fabric. Legibility and signposting can also make an important contribution to whether people feel comfortable in a place, and are able to understand it and navigate their way around. Ongoing maintenance of this infrastructure should be a key consideration in the design of places and secured through the planning system where appropriate. Managed public spaces in new development should offer the highest level of public access.”

- 3.48 Each of these issues is addressed directly in the layout and design of the building. The landscape and the pedestrian routes within the scheme are integrated. An Outline Estate Management Strategy is submitted with the application (Appendix15). This provides, inter alia, details of the measures for the ongoing management of the scheme including the private open space.
- 3.49 In respect of architecture Policy 7.6 states, inter alia:
- “A. Architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context.”*
- 3.50 The scheme is designed to enhance the Conservation Area and incorporates appropriate design details and materials
- 3.51 In respect of improving air quality Policy 7.14 states, inter alia:
- B Development proposals should:*
- a. minimise increased exposure to existing poor air quality*
- 3.52 The submitted Air Quality Assessment (Appendix13) demonstrates that subject to design detail the development will meet the relevant criteria.
- 3.53 In respect of Reducing and Managing Noise Policy 7.15 states, inter alia:
- “B. Development proposals should seek to manage noise by:*
- a. avoiding significant adverse noise impacts on health and quality of life as a result of new development;*
- 3.54 The Noise Assessment Report (Appendix12) confirms that the development will not generate adverse noise impacts and subject to the glazing specification internal noise levels for all residential environments within the proposed development will be to the recommendations of BS8233:2014.
- 3.55 Policy 8.3 relates to Community Infrastructure Levy and it is acknowledged that the development will generate a CIL payment. This is currently estimated to be in the order of £392k to the Mayors CIL fund and £1.332million to the London Borough of Richmond

LONDON PLAN - Supplementary Planning Guidance

Housing SPG

- 3.56 Adopted in March 2016 and revised in May 2016 this SPG supersedes the Interim London Housing Design Guide (August 2010) sets out seven issues: these are:
- Part 1 housing supply - this provides new guidance to Local Planning Authorities (LPAs) on achieving and exceeding minimum housing targets and advises on potential sources of additional housing capacity. It also sets out the Plan’s approach to optimising housing output and advises on the application of the Sustainable Residential Quality (SRQ) density matrix.
- Part 2 covers housing quality – this updates London housing standards to reflect the implementation of the Government’s new national technical standards through the MALP. Some amendments have also been made to the standards not affected by the new national standards to improve clarity, implementation and alignment with other Mayoral guidance.
- Part 3 covers housing choice.
- Part 4 covers viability appraisals – this provides guidance on the Mayor’s preferred approach to viability appraisals.

Part 5 covers investment and existing housing stock.

Part 6 covers social infrastructure.

Part 7 covers mixed use and large developments.

- 3.57 The principles and approach of the objectives and standards set by Part 2 have been adopted in the development of the design.

Sustainable Design and Construction SPG

- 3.58 The overarching policy for this SPG, adopted April 2014, is Policy 5.3 of the London Plan (referred to above).

- 3.59 As stated previously the design adopts the principles of sustainability in choice of materials and detailing and by provision of the integrated roof mounted PV cells as detailed in the Energy Statement (Appendix7)

Character and Context SPG

- 3.60 The objectives of this SPG, adopted June 2014, are to provide specific guidance on the attributes of character and context in London (physical, cultural, social, economic, perceptions and experience) together with an analysis of the interrelationships between different aspects of character and examples of good practice in how an understanding of character and context can be used to help manage change in a way that sustains and enhances the positive attributes of a place.

- 3.61 The SPG notes that Character

“is created by the interplay of different elements, including the physical or built elements that make up the place, the cultural, social and economic factors which have combined to create identity, and the people associated with it through memories, association and activity.”

and that **Context** can be defined as

“the way in which places, sites and spaces inter relate with one another whether physically, functionally or visually, or the way in which they are experienced sequentially and understood.”

- 3.62 The SPG sets out ‘Guiding Principles’ relevant to the consideration of Local Character and Context, this includes:

“Character is a dynamic concept – evolution and change are a fundamental characteristic of London.”

and at paragraph 3.7 states:

*London is the product of a complex set of inter-related processes and layering of different phases of cultural, social and economic evolution. As change is a fundamental characteristic of London, **respecting character and accommodating change should therefore not be seen as mutually exclusive**. Understanding of the character of a place should not seek to preserve things in a static way but should ensure an appropriate balance is struck between existing fabric and any proposed change. This will vary depending on the environment and what is proposed. It is therefore essential to gain an appreciation of what defines the identity of a location, understand what is special or valued, and how different components may be sensitive or vulnerable, and using this information positively to guide and inform change. In some cases, this may include the creation of areas with a new or altered character. Overview of the process for understanding the character and context of a place”*

- 3.63 The Architectural Design Statement includes an assessment of the context and character of the site and its role and relationship to this part of Hampton Hill. The proposed scheme aims

to respect this context while introducing acceptable change and scope of development which will enhance the wider character of the area.

The Control of Dust and Emissions During Construction and Demolition SPG

- 3.64 This SPG, adopted July 2014, seeks to reduce emissions of dust from construction and demolition activities in London. It also aims to manage emissions of nitrogen oxides from construction and demolition machinery by means of a new non-road mobile machinery ultra low emissions zone
- 3.65 These issues are addressed in the submitted Air Quality Assessment Report (Appendix13) which shows that there will be negligible risk to Human Health and Ecology during the demolition, earthworks and construction stages of the development with a low risk associated with the 'track-out' vehicular movements during these phases.

Shaping Neighbourhoods Accessible London: Achieving an Inclusive Environment SPG

- 3.66 The overarching policy for this SPG, adopted October 2014, is Policy 3.1 which seeks to ensure equal life chances for all. The SPG cross-relates and develops upon the inclusive design requirements of the NPPF and the NPPG (paragraph 012) and Policy 7.2 of the London Plan (as referred to above).
- 3.67 The design has been developed with the objectives and policy requirements in respect of inclusive design to the fore.

THE LOCAL PLAN

- 3.68 Richmond's Local Plan is made up of a suite of documents including the Core Strategy, adopted April 2009; the Development Management Plan, adopted in November 2011 and SPD's and SPG's. A new (replacement) Local Plan is currently being prepared. This has been the subject of pre-publication consultation (July / August 2016) and therefore at this stage regard should be given to the emerging revised policies, although the weight to be given to these is limited.
- 3.69 The Core Strategy Policies relevant to the consideration of this application are:
- CP1 Sustainable Development
 - CP2 Reducing Carbon Emissions
 - CP3 Climate Change - Adapting to the Effects
 - CP4 Biodiversity
 - CP5 Sustainable Travel
 - CP7 Maintaining and Improving the Local Environment
 - CP8 Town and Local Centres
 - CP14 Housing
 - CP15 Affordable Housing

- 3.70 Policy CP1 seeks to maximise the effective use of resources including land and promotes the appropriate location of land uses, reducing any long term adverse environmental impacts of development. At 1B it states, inter alia:

“Redevelopment of sites should normally only take place where there can be an increase in the number of housing units and/or quantity of commercial floorspace”

and, inter alia, at 1C:

“Local environmental impacts of development with respect to factors such as noise, air quality and contamination should be minimised.”

- 3.71 The proposal accords with these and the other objectives of sustainable development embraced in this policy.

- 3.72 In respect of Reducing Carbon Emissions Policy CP2 states at 2C:
- “The Council will increase the use of renewable energy by requiring all new development to achieve a reduction in carbon dioxide emissions of 20% from on-site renewable energy generation unless it can be demonstrated that such provision is not feasible, and by promoting its use in existing development.”*
- 3.73 As set out in the Energy Statement (Appendix7) the scheme is designed to comply with the requirements of the London Plan which seeks a higher level of on-site renewable energy to be provided.
- 3.74 In respect of Climate Change Policy CP3 states, inter alia:
- “Development will need to be designed to take account of the impacts of climate change over its lifetime, including:*
- Water conservation and drainage*
 - The need for Summer cooling*
 - Risk of subsidence*
 - Flood risk from the River Thames and its tributaries”*
- 3.73 As set out in appendices addressing Energy; Flood Risk; Drainage Strategy and Basement Impact Assessment (Appendix7; 10B; 11A and 11B) the scheme addresses these considerations positively.
- 3.74 Policy CP4 seeks to encourage biodiversity enhancements and the safeguarding of SSSI's and other sites of Nature Importance. The Ecological Assessment (Appendix9A&B) shows that the site does not especially support biodiversity and the Landscape Design (Appendix2) aims to enhance and increase the biodiversity profile. Equally the Arboricultural Report (Appendix5) shows that the existing trees on the site are poor and the new planting proposed will provide further enhancement. The site is close to the designated SSSI of Bushy Park. Consideration has been given to the potential impacts of the development on the SSSI in the Air Quality Assessment (Appendix13) and the Lighting Assessment (Appendix16). Both assessments show that there will be no adverse impacts.
- 3.75 Policy CP5 seeks to promote sustainable travel and as part of this objective to seek that developments address the needs for safe, sustainable and accessible transport modes such as walking, cycling and public transport, including a requirement for adequate cycle parking and a regard for maximum car parking provision. These considerations are addressed in detail in the Transport Statement (Appendix3)
- 3.76 Policy CP7 addresses retaining the good and improving the less good in the Local Environment. Policy 7B states:
- “All new development should recognise distinctive local character and contribute to creating places of a high architectural and urban design quality that are well used and valued. Proposals will have to illustrate that they:***
- (i) are based on an analysis and understanding of the Borough's development patterns, features and views, public transport accessibility and maintaining appropriate levels of amenity;*
 - (ii) connect positively with their surroundings to create safe and inclusive places through the use of good design principles including layout, form, scale, materials, natural surveillance and orientation, and sustainable construction.*
- 3.77 The development and refinement of the design proposals are based in the assessment of the context of the site and the setting within the Hampton Hill Conservation Area and the need to enhance the character of the Conservation Area: all as set out in detail in the Architectural

Design Statement (Appendix1). The objective is for the development to be an exemplar for inclusive contemporary urban living through its layout, form, scale, and choice of materials.

3.78 Hampton Hill is a Local Centre, as defined in the hierarchy of centres set out in Policy CP8 and included as part of the objectives for residential development is to encourage density suitable for its site.

3.79 Policy CP14A states that the Council will exceed the minimum strategic dwelling requirement, where this can be achieved in accordance with other Local Development Framework policies.

3.80 As noted above the strategic targets set in the London Plan have increased since the adoption of the Core Strategy and are expected to increase further going forward. It is therefore imperative to ensure that sites such as this make a full contribution to meeting and exceeding the minimum strategic.

3.90 Policy CP14D states that the density of residential proposals should take into account the need to achieve the maximum intensity of use compatible with local context and refers to the Density Matrix of the London Plan. This is addressed in paragraph 3.37 above

3.91 Policy CP14E states:

“All housing should be built to Lifetime Homes standards and 10% of all new housing should be to wheelchair standards. The private sector element of any development will include an appropriate number of small (1-bed) units, depending on location. This would be at least 25%, rising to the great majority (at least 75%) in more sustainable locations, such as town centres and other areas with high public transport accessibility and with good access to facilities.”

3.92 The scheme accords with the Lifetime Home Standards and incorporates units designed to be readily adaptable for occupation by a wheelchair user. In terms of mix the scheme provides c.38% one bed and studio flats.

3.93 Policy CP15 addresses the provision of affordable housing and the requirement for some form of contribution towards affordable housing will be expected on all new housing sites.

3.94 However, to be consistent with the NPPF and NPPG the viability of provision has to be considered. The supporting text to Policy CP15 states, inter alia, at 8.3.3.7:

“Where viability is an issue in providing affordable housing, the onus will be on developers to produce a financial assessment showing the maximum amount that could be achieved on the site.”

The NPPG advises:

Where the viability of a development is in question, local planning authorities should look to be flexible in applying policy requirements wherever possible.

3.95 Since the adoption of the Core Strategy, ‘Starter Homes’ have been added to the definition of affordable housing. The application proposes that 4 of the units will be provided as starter homes and a Viability Assessment (Appendix14) is submitted which demonstrates that the proposal cannot support any additional or alternative affordable housing as part of the development.

3.96 The Development Management Plan policies relevant to the consideration of this application are listed below in Table 2:

Table 2

Policy	Title
SD1	Sustainable Construction
SD2	Renewable Energy and Decentralised Energy Networks
SD4	Adapting to Higher Temperatures and Need for Cooling
SD5	Living Roofs
SD6	Flood Risk
SD7	Sustainable Drainage
SD10	Water and Sewerage Provision
OS5	Biodiversity and new development
TC2	Local and Neighbourhood Centres and Areas of Mixed Use
TC4	Local Shops, Services and Public Houses
HD1	Conservation Areas – designation, protection and enhancement
HD4	Archaeological Sites
HO4	Housing Mix and Standards
HO6	Delivering Affordable Housing
EM2	Retention of Employment
TP1	Matching Development to Transport Capacity
TP2	Transport and New Development
TP3	Enhancing Transport Links
TP6	Walking and the Pedestrian Environment
TP7	Cycling
DC1	Design Quality
DC2	Layout and Design of Mixed Use Schemes
DC3	Taller Buildings
DC4	Trees and Landscape
DC5	Neighbourliness, Sunlighting and Daylighting
DC6	Balconies and Upper Floor Terraces
DC7	Shop fronts and shop signs
App 4	Parking Standards

3.97 The considerations relevant to each of these policies are reviewed and commented upon in Section 4 below or covered in detail in the attached topic related Appendices.

3.98 The Supplementary Planning Documents (SPD) relevant to the consideration of this application are:

- Affordable Housing (March 2014) [superseded by draft policy LP36 of Pre-Publication Local Plan]
- Design Quality (Feb 2006)
- Small and Medium Housing SPD (Feb 2006)
- Refuse and Recycling Storage Requirements (April 2015)
- Residential Development Standards (March 2010)
- Sustainable Construction Checklist (Jan 2016)
- Planning Obligations SPD (March 2014 2016)

3.99 The Supplementary Planning Guidance (SPG) relevant to the consideration of this application are:

- Conservation Areas (Sept 2002) and High Street (Hampton Hill) Conservation Area 38 Designation Statement (March 1996)
- Contaminated Land (2003)

3.100 The draft SPD's relevant to the consideration of this application are:

- Hampton Hill Draft Village Planning Guidance (Aug 2016)
- Noise Generating and Noise Sensitive Development (July 2014)

- 3.101 The considerations relevant to each of these SPD's and SPG's are reviewed and commented upon in Section 4 below or are specifically covered in detail in the attached topic related Appendices.
- 3.102 The Local Plan Pre-publication version issued for consultation in July 2016 relevant to the consideration of this application are listed in Table 3:

Table 3

Policy	Title
LP1	Local Character and Design Quality
LP2	Building Heights
LP3	Designated Heritage Assets
LP 7	Archaeology
LP8	Amenity and Living Conditions
LP10	Local Environmental Impacts, Pollution and Land Contamination
LP11	Subterranean developments and basements
LP15	Biodiversity
LP16	Trees and Landscape
LP17	Green Roofs and Walls
LP20	Climate Change Adaptation
LP21	Flood Risk and Sustainable Drainage
LP22	Sustainable Design and Construction
LP24	Waste Management
LP25	Development in Centres
LP34	New Housing
LP35	Housing Mix and Standards
LP36	Affordable Housing
LP40	Employment and local economy
LP44	Facilitating Sustainable Travel Choices
LP45	Parking Standards and Servicing Parking standards

- 3.103 For the most part these emerging policies are developments upon the extant policies of the Core Strategy and the Development Management Plan and are covered in the commentary at Section 4 below or are specifically covered in detail in the attached topic related Appendices. Extracts from specific policies which seek new or enhanced requirements and are of particular relevance to this proposal are set out below.
- 3.104 Policy LP 1 - Local Character and Design Quality, states, inter alia:

“A. The Council will require all development to be of high architectural and urban design quality..... Development proposals will have to Take opportunities to improve the quality and character of buildings, spaces and the local area.

To ensure development respects, contributes to and enhances the local environment and character, the following will be considered when assessing proposals:

- 1. compatibility with local character including the relationship to existing townscape, development patterns, views, local grain and frontages as well as scale, height, massing, density, landscaping, proportions, form, materials and detailing;*
- 2. sustainable design and construction, including adaptability, subject to aesthetic considerations;*
- 3. layout, siting and access, including making best use of land;*
- 4. space between buildings, relationship of heights to widths and relationship to the public realm and natural features;*
- 5. inclusive design, connectivity (as such gated developments will not be permitted), natural surveillance and orientation; and.....”*

3.105 The design has been developed in line with the principle objectives of this policy to respect and enhance through carefully considered details which provides overall coherence in the layout, massing and design so that it complements the neighbouring buildings in a contemporary form which will enhance the overall character of the conservation area.

3.106 Policy LP 2 Building Heights, states, inter alia:

“The Council will require new buildings to respect and strengthen the setting of the borough’s valued townscapes and landscapes, through appropriate building heights, by the following means:

1. require buildings to make a positive contribution towards the local character, townscape and skyline, reflecting the prevailing building heights within the vicinity;
2. preserve and enhance the borough’s heritage assets, their significance and their setting;
3. respect the local context, and where possible enhance the character of an area, through appropriate:

- a. scale**
- b. height**
- c. mass**
- d. urban pattern**
- e. development grain**
- f. materials**
- g. streetscape**
- h. Roofscape and**
- i. wider townscape and landscape;**

4. take account of climatic effects, including overshadowing, diversion of wind speeds at ground level, heat island and glare;

5. refrain from using height to express and create local landmarks;

6. resist buildings that are taller than the surrounding townscape other than in exceptional circumstances, such as where the development is of such high architectural design quality and standards, delivers public realm benefits and as such has a wholly positive impact on the character and quality of the area;”

3.107 The design of the scheme has been developed and refined to ensure that the new buildings will enhance the townscape and provide a varied and interesting skyline both in short and longer distance views, including the views from neighbouring Bushy Park. The scale of the elements of the design take references from the neighbouring developments and the proposed reinstatement of the historic building line is intended to reinforce the urban pattern and development grain of this section of the High Street.

3.108 Policy LP 3 Designated Heritage Assets states, inter alia:

“B. Resist substantial demolition in Conservation Areas unless it can be demonstrated that:

3. the building or part of the building or structure makes no positive contribution to the character or distinctiveness of the area.”

3.109 The existing buildings are considered to make no positive contribution to the character of the Hampton Hill Conservation Area and the replacement is designed to enhance the visual and active character of the area.

3.110 Policy LP 10 Local Environmental Impacts, Pollution and Land Contamination, states, inter alia:

“Light Pollution

D. The Council will ensure that artificial lighting in new developments does not lead to unacceptable impacts by requiring the following, where necessary:

- 1. an assessment of any new lighting and its impact upon any receptors;***
- 2. mitigation measures, including the type and positioning of light sources;***
- 3. promotion of good lighting design and use of new technologies”***

And

Construction and demolition

G. The Council will seek to manage and limit environmental disturbances during construction and demolition as well as during excavations and construction of basements and subterranean developments. To deliver this the Council requires the submission of Construction Management Statements for the following types of developments:

1. all major developments;
2. any basement and subterranean developments;
3. developments of sites in confined locations or near sensitive receptors; or
4. if substantial demolition/excavation works are proposed.”

- 3.111 In the pre-application consultation with the public and other interested parties the potential for light emission from the proposal to have an impact upon the habitat of the fauna of Bushy Park has been raised. A lighting assessment of extant and future conditions has been undertaken (Appendix16). This concludes that the characteristics of the proposed residential use and the proposed lighting design will not result in any unacceptable impacts.
- 3.112 The considerations relevant to the logistics of managing the demolition, site preparation and construction phases are addressed in the submitted Construction Logistics Plan (Appendix17).
- 3.113 Consideration of the Air Quality; Noise; and Contamination aspects of Policy LP10 are addressed in the respective Appendices.
- 3.114 Policy LP 11 Subterranean developments and basements, states, inter alia:
*“2. Demonstrate the scheme safeguards the structural stability of the existing building, neighbouring buildings and other infrastructure, including related to the highway and transport
5. demonstrate as part of a Construction Management Statement that the development will be designed and constructed so as to minimise the impact during construction and occupation stages.”*
- 3.115 These considerations are addressed in the Basement Impact Assessment (Appendix10b) and Construction Logistics Plan (Appendix17).
- 3.116 Policy LP 17 Green Roofs and Walls, states, inter alia:
*“Green roofs should be incorporated into new major developments with roof plate areas of 100sqm or more where technically feasible and subject to considerations of visual impact. The aim should be to use at least 70% of any potential roof plate area as a green roof. The onus is on an applicant to provide evidence and justification if a green roof cannot be incorporated. The Council will normally expect a green wall to be incorporated where it has been demonstrated that a green roof is not feasible.
The use of green roofs and walls is encouraged and supported in smaller developments, renovations, conversions and extensions*
- 3.117 The design incorporates a combination of accessible roofs and terraces part of which will be non-intensive and it is proposed to also provide climbing green wall cover in appropriate locations all as illustrated in the Landscape Design Statement (Appendix3). A large part of the roof to the apartment buildings is in an articulated form incorporating integrated photovoltaic film which is designed to meet the renewable energy requirements of carbon reduction and this reduces the area available for green roof installation.

3.118 Policy LP 22 Sustainable Design and Construction, states, inter alia:

*“A. Developments will be required to achieve the highest standards of sustainable design and construction in order to mitigate against climate change. **Applicants will be required to comply with the following:***

*1. Development of 1 dwelling unit or more, or 100sqm or more of non-residential floor space (including extensions) will be required to comply with the **Sustainable Construction Checklist SPD. A completed Checklist has to be submitted as part of the planning application.***

*3. **New non-residential buildings over 100sqm will be required to meet BREEAM ‘Excellent’ standard.***

*B. **Developers are required to incorporate measures to improve energy conservation and efficiency as well as contributions to renewable and low carbon energy generation. Proposed developments are required to meet the following minimum reductions in carbon dioxide emissions:***

*1. **All new residential buildings should achieve a 35% reduction.***

*2. **All major non-residential buildings should achieve a 35% reduction.”***

3.119 These requirements are met as demonstrated in the Energy Statement (Appendix7); the Sustainability statement (Appendix 8A) and the New Construction 2014 Pre-Assessment (Appendix8B).

3.120 Policy LP 24 Waste Management, states, inter alia:

“The Council will ensure that waste is managed in accordance with the waste hierarchy, which is to reduce, reuse or recycle waste as close as possible to where it is produced. The Council will require the following:

1. All developments,are required to provide adequate refuse and recycling storage space and facilities, which allows for ease of collection and which residents and occupiers can easily access, in line with the Council's SPD on Refuse and Recycling Storage Requirements.

2. All developments need to ensure that the management of waste, including the location and design of refuse and recycling facilities, is sensitively integrated within the overall design of the scheme, in accordance with policies on Local Character and Design.

3. Development proposals, where appropriate, should make use of the rail and the waterway network for the transportation of construction, demolition and other waste.

4. All major developments, and where appropriate developments that are likely to generate large amounts of waste, are required to produce site waste management plans to arrange for the efficient handling of construction, excavation and demolition waste and materials”.

3.121 These issues are addressed in the design and the supporting Outline Estate Management Strategy (Appendix15) and the Construction Logistics Plan (Appendix17). Preliminary investigation of use of the nearby rail network for removal of the demolition excavation spoil has concluded that this is not feasible.

3.122 Policy LP 25 Development in Centres, states, inter alia:

*“A. **Development in the borough's centres, as defined in the centre hierarchy, will be acceptable if it:***

*1. **is in keeping with the centre's role and function within the hierarchy and is of a scale appropriate to the size of the centre and***

*2. **is in an appropriate location, as follows:***

*a. **A1 uses should be located within, adjacent to or well-related (or capable of being made so) to designated shopping frontages.***

*4. **optimises the potential of sites by contributing towards a suitable mix of uses that enhance the vitality and viability of the centre. Commercial or community uses should be provided on the ground floor fronting the street, subject to other Local Plan policies, including the retail frontages policy LP 26.***

C. In addition to A above, **in the local** and neighbourhood **centres** as well as parades of local importance, the following applies:

1. **Appropriate uses could include new retail** (including markets), **business or employment developments, which maintain suitable provision for small businesses, and other uses, which primarily serve the needs of the local community** or attract visitors and develop cultural opportunities.
2. **Development should, wherever possible, include overall improvements and enhancements of the small centres where appropriate, and/or modernise outdated premises.**

3.123 The proposed development is in full accord with the objectives and requirements of this policy.

3.124 Policy LP 34 New Housing, states, inter alia:

*“A. The Borough's target is 3,150 homes for the period 2015-2025. This target will be rolled forward until it is replaced by a revised London Plan target. **The Council will exceed the minimum strategic dwelling requirement, where this can be achieved in accordance with other Local Plan policies.**”*

3.125 This policy is consistent with the requirements of the London Plan and the NPPF and the considerations relating to the reasonable maximisation of supply which the application seeks to achieve.

3.126 Policy LP 36 Affordable Housing, states, inter alia:

“C. The Council will seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes. The Council will have 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.*

D. Where a reduction to an affordable housing contribution is sought on economic viability grounds, developers should provide a development appraisal to demonstrate that schemes are maximising affordable housing. The developer will be required to underwrite the costs of a Council commissioned economic viability assessment. The Council will rigorously evaluate such appraisals and:

- a. assess if the maximum reasonable amount of affordable housing is based on delivering the appropriate tenure, unit sizes and types that address local needs.*
- b. consider whether it is necessary to secure provision for re-appraising the viability of a scheme prior to implementation to secure contingent obligations.*
- c. in most circumstances the Existing Use Value plus a premium (EUV+) approach to assessing benchmark land value in development appraisals and viability assessments should form the primary basis for determining the benchmark land value.”*

3.127 The submitted viability appraisal and accompanying report (Appendix14) follow these provisions of Policy LP36 and show that the development is not able to support the provision of affordable housing as sought by the policy.

3.128 Policy LP 40 Employment and local economy, states, inter alia:

“1. Land in employment use should be retained in employment use for business, industrial or storage purposes.”

3.129 At paragraph 10.2.9 Designated Key Office Areas, which are shown on the Proposals Map, are listed. In Hampton Hill these are Hampton Hill Business Park and the northern part of High Street.

- 3.130 This does not include the application site.
- 3.131 Furthermore, as noted earlier, the buildings have been largely vacant from 3 to 8 years and were marketed for continued office use from December 2008 until February 2015 - (Appendix4) and by notice dated 20th October 2016 Prior Approval was issued by the Council for the change of use from B1 offices to C3 residential.
- 3.132 in light of these considerations policy LP40 is not applicable.
- 3.133 Policy LP 44 Facilitating Sustainable Travel Choices, states, inter alia:
- “The Council will work in partnership to promote safe, sustainable and accessible transport solutions, which minimise the impacts of development including in relation to congestion and air pollution, and maximise opportunities including for health benefits and providing access to services, facilities and employment. The Council will:*
- A. Location of development*
Encourage high trip generating development to be located in areas with good public transport with sufficient capacity, or which are capable of supporting improvements to provide good public transport accessibility and capacity.
- B. Walking and cycling*
Ensure that, where appropriate, new development is designed to maximise permeability within and to the immediate vicinity of the development site through the provision of safe and convenient walking and cycling routes, and to provide opportunities for walking and cycling, including through the provision of links and enhancements to existing networks.
- C. Public transport*
Ensure that major new developments maximise opportunities to provide safe and convenient access to public transport services. Proposals will be expected to support improvements to existing services and infrastructure where no capacity currently exists or is planned to be provided.....
- D. The road network*
Ensure that new development does not have a severe impact on the operation, safety or accessibility to the local or strategic highway networks. Any impacts on the local or strategic highway networks, arising from the development itself or the cumulative effects of development, including in relation to on-street parking, should be mitigated through the provision of, or contributions towards, necessary and relevant transport improvements. In assessing planning applications the cumulative impacts of development on the transport network will be taken into account.”
- 3.134 The submitted Transport Statement (Appendix3) and the Air Quality Assessment (Appendix13) address these policy considerations in detail and show that the proposal complies.
- 3.135 Policy LP 45, Parking Standards and Servicing, states, inter alia:
- “Parking standards*
The Council will require new development to make proper provision for the accommodation of vehicles in order to minimise the impact of car based travel including on the operation of the road network and local environment and ensuring making the best use of land. It will achieve this by:
- 1. Requiring new development to provide for car, cycle, 2 wheel and, where applicable, lorry parking and electric vehicle charging points in accordance with the standards set out in Appendix 3. Opportunities to minimise car parking through its shared use will be encouraged.”*
- 3.136 It is noted that the Parking standards referred to in Appendix 3 are in fact under review. The scheme complies with current standard as set out in the submitted Transport Statement (Appendix3).
- 3.137 As discussed during the pre-application review the applicant confirms that the A1 retail will exclude food retail outlets which would require regular deliveries

4.0 PRE APPLICATION CONSULTATION

London Borough of Richmond

- 4.1 A formal pre-application submission was made to the Council in June 2016 for the precursor to the current application. At that time the proposal included 8 town houses on the west half of the site and 17, two-bedroom, 12, one-bedroom and 3 studio apartments in the front buildings together with be a retail unit of c. 200m² in the southern element and a resident's room / communal café of c.80m² in the northern element and 49 car parking spaces; secure cycle storage; refuse stores; resident's stores and plant rooms in the basement.
- 4.2 the submission was supported with a Draft PDAS and a Draft Architectural Design Statement - Context Assessment.
- 4.3 A meeting was held to discuss the submission on 4th August 2016 and it was agreed that detailed written comments would not be issued so as to allow the pre-application to remain open and further discussions to continue. A full note of the points arising was subsequently prepared and circulated to the Council (Appendix 19).
- 4.4 We were advised that the principle of redevelopment was itself acceptable but the extant Core Strategy policy CP19 and Local Plan policy CP19A both require retention / replacement of existing employment uses and the proposed development was contrary to these policies.
- 4.5 This issue has been addressed by the subsequent Prior Approval for the change of use of the existing buildings to residential apartments, which if implemented, would extinguish the extant B1 use.
- 4.6 We were advised that land use issues aside there was a lot of the proposed scheme that was liked.
- 4.7 It was agreed that the existing buildings make no beneficial contribution to the character of the Conservation Area and that redevelopment would in principle enhance the overall setting and that this was welcomed. It was also agreed that a contemporary design, as illustrated, could achieve the required enhancement and no concerns were raised regarding the principle of the proposed reinstatement of the historic building line or the proposed vehicular and pedestrian access points and there was general support for the courtyard approach to the scheme.
- 4.8 We were advised that there was concern about the proposed height of the building as the design presented at that stage was considered to be detrimental to the character of the conservation area. This advice led to a review of the design the results of which are incorporated in the application. The changes made include reductions in the slab to slab levels, including the top roof storey, together with a reduction in the extent of the roof storey setting it back further from the main elevations. These changes, submitted for information by e-mail were discussed with the responsible Urban Design Officer on 18th November 2016 and we were advised that it was considered that the design had all moved in a positive direction and that the height of the High Street frontage was now generally acceptable and that the materials work well. Subsequent modifications have been made to the main windows of the front elevation in response to comments provided.
- 4.9 The comments provided in respect of the transport and highways have been addressed in the development of the details of the design as set out in the Transport Statement (Appendix3) and the considerations in respect of Affordable Housing are addressed in the submitted Viability Assessment Report (Appendix14).

Public and Other Consultation.

- 4.10 Pre application public consultation has been carried out in accordance with national and local policies, as set out in the following section of this report, and exceeds the requirements of the Council's Statement of Community Involvement (June 2006) first in July and then again in September. The Statement of Community Involvement (Appendix20) details the extent of consultation and reports on the overall results.
- 4.11 The key aims of the consultation exercise were:
- To inform local residents; businesses; councillors and other stakeholders about the applicants aspirations for the site.
 - To gain a full understanding of local views of the proposals, engage with the local and wider community as part of the design development stage, and to review the comments received to identify concerns and opportunities, and where possible inform the evolving final proposals.
 - To demonstrate how the applicants have responded to the issues raised by the community and stakeholders and identify how changes have been made to the proposals.
- 4.12 From the various responses received there appears to be:
- wide support for the principle of redeveloping the site to provide much needed homes and shops on the High Street.
 - support for the proposed mix of houses and smaller 1 & 2 bedroom apartments arranged around the inner and outer courts.
 - agreement that the development will bring benefit and enhancement to Hampton Hill.
 - support for the proposed provision of secure on-site parking for residents of the development in accordance with the adopted standards of the borough, although there were residents who considered that there was insufficient parking.
 - concerns were expressed about disturbance (particularly to traffic flows) during the construction of the development.
 - a mixed range of comments relating to the design and scale: some preferring the original roof form while others see the changes as improvements.

5.0 CONSIDERATIONS

The Principle of Development

- 5.1 This is an unused brownfield site for which Prior Approval has been issued for the change of use of the existing vacant B1 office buildings to C3 residential flats.
- 5.2 The principle of bringing the site forward for development to provide 39 new homes together with the introduction of active retail units on the street frontage accords fully with policy and the strongly indicated travel of direction of the government.
- 5.3 As set out in the review of the Planning Framework the directions of the NPPF and the policies of the London Plan and the Local Plan both extant and emerging together with all related SPD's and SPG's, have been carefully considered in the development and refinement of the proposal.
- 5.4 As part of the design process the applicant and the design team have reviewed the relevant balancing tests that are required of the decision maker to ensure that the scheme will be considered compliant in balance and overall acceptable.
- 5.5 Although Prior Approval has been issued for the adaptation of the existing buildings; which is a relevant material consideration that needs to be part of the balancing exercise; the preferred option of the applicant is to bring forward a development of an exemplary crafted contemporary scheme, providing a range of apartments and houses designed to meet the requirements of modern living, which will enhance this part of the High Street and Hampton Hill more generally.
- 5.6 On the High Street the scale form, and rhythm of the buildings takes keys from the surroundings but not mimicking any of the current architectural styles and seeks to bring the urban format into the site through a pedestrian entrance into outer and inner landscaped courts which will be quiet, secluded and slightly out of the ordinary.
- 5.7 There will be retail units at ground level fronting the street to add vitality where there is currently a relatively dead frontage.
- 5.8 To achieve an appropriate density in a pedestrian friendly environment the scheme incorporates a basement car park accessed via a gated ramp off the southern side of the frontage. This will provide space in line with current standards as well as secure cycle and refuse storage. Details of the management of the completed development is set out in the Outline Estate Management Strategy (Appendix15)
- 5.9 As the review of the other planning considerations (set out in this statement) show the proposal will not cause any harm to interests of acknowledged importance; is of exemplary design quality, with a high level of policy compliance and with the significant benefits of increased housing provision and socio-economic regeneration.
- 5.10 The London Plan as adopted in March 2015 set a new target for the delivery of housing to address London's desperate ever increasing housing need. The target is for a minimum of 42,389 units per annum overall with 315 in Richmond (an increase of 28% over the previous targets). Even so, as set out in the report of the Inspector on the EiP of the FALP the published household projections show:
"that meeting London's objectively assessed need (including the backlog) over 10 years would require a build rate of 62,000 dwellings per annum (dpa). Meeting need over 20 years would require a rate of 49,000 dpa."

- 5.11 Both of these figures are significantly above the adopted target and the London Plan states: *“Boroughs should draw on the housing benchmarks in table 3.1 in developing their LDF housing targets, augmented where possible with extra housing capacity to close the gap between identified housing need and supply in line with the requirement of the NPPF”.*
- 5.12 It follows, (particularly in boroughs such as Richmond where the opportunity to bring forward high and medium density development do not exist to any particular extent), that even for the minimum targets of the London Plan to be met, let alone exceeded, it requires sites such as this to be brought forward and in doing so make a full contribution to enhancing environment all in line with the sustainable development principles of the NPPF.
- 5.13 The site and the proposed development represent an opportunity to provide a 12% contribution to meeting the minimum identified housing need targets for Richmond and thereby make a worthy addition to the desperate London wide need for new homes for its expanding population which is deliverable: a requirement of the NPPF.
- 5.14 To help with boosting the supply of housing, the NPPF (para.47) requires local planning authorities to identify and keep up-to-date a deliverable five-year housing land supply against their housing requirement, with an additional buffer of 5%.
- 5.15 To be considered deliverable, sites should be available, be in a suitable location for development, be achievable (i.e. with a realistic prospect that housing will be delivered within five years) and in particular, that the development is viable. As stated previously the proposed development meets these criteria.
- 5.16 In determining the number and size of units that might be accommodated on the site regard has been had to the London Plan density matrix. The residential density of the scheme is 158 units per hectare and thus meets the provisions of Policy 3.4 of the London Plan which requires between 70 – 170 u/ha to be provided on urban sites with a PTAL of 2.
- 5.17 The London Plan and the Local Plan also require a sufficient mix of housing sizes and types to be provided. The mix of unit sizes proposed is designed to respond to the predominant identified housing need of one and two bedroom units for smaller households with three bedroom houses designed to meet the needs of families.
- 5.18 The development will therefore provide a balanced and sustainable mix of accommodation in accordance with the objectives set out in the NPPF the London Plan; and the Local Plan
- 5.19 The principle of the development therefore accords with the objectives and policies of the NPPF and the Development Plan.

Layout and Access

- 5.20 The location of the site and its context is of a mixed urban character and the scale, form and density of the proposal has been designed to respond to this having regard to the over-riding objective set in National, Regional and Local policies to increase housing supply on sites such as this.
- 5.21 As illustrated in the Architectural Design Statement (Appendix1) pedestrian access to the building is via safe and convenient private outer and inner courts off the High Street with the vehicular activity all confined to the access to the basement which has been designed to incorporate fully compliant sight and visibility lines. The ramp will be gated and CCTV will be installed for security:(see Outline Estate Management Strategy -Appendix 15)

- 5.22 The positioning of the entrances will ensure that the activity of coming and going by residents and their visitors and the use of all shared space which will be lighted and overlooked by the flats and houses is subject to natural surveillance at all times. This is in accordance with the principles of secured by design.
- 5.23 There is direct access by lift and stair to the basement car park and cycle and refuse storage areas via the individual cores serving the upper floors.
- 5.24 Entrances into the building are level and wheelchair accessible and each core has a lift and a staircase serving all floors.
- 5.25 The flat layouts are designed to maximise daylight and sunlight into each of the units and the orientation of the building which responds to its setting and relationship with adjoining developments ensures compliance with daylight and sunlight standards as set out in the BRE guidance: (see [Appendix 18](#)).
- 5.26 The layout of the accommodation has been carefully planned and sized to provide good internal amenity for future occupants in accordance with the National Space Standards; the policies of the London Plan, the Housing SPG Design Guide and the Local Plan. The accommodation is designed to meet the needs and aspirations of all users and is of a high standard.

Scale of Development

- 5.27 In determining an appropriate scale for the development regard has been had to the relationship with and scale and form of the surrounding mixed context and the need to use scarce land resource effectively and efficiently. The Architectural Design Statement ([Appendix 1](#)) addresses the considerations of scale and design. The proposed massing aims to optimise the potential of the site in terms of light, views and accessibility while being sensitive to the form and scale of its context. The massing is urban; however, the architectural articulation of the elevations with the rhythm of the matrix and proportion of the elements gives the buildings a domestic scale.

Design and Appearance

- 5.28 The site is in a conservation area, however, the scale, form and appearance of the buildings in the immediate and wider area is diverse, as is described in the Architectural Design Statement ([Appendix 1](#)). The design incorporates carefully considered details to provide an overall coherence in the layout and elevational treatments and the varied roofline.
- 5.29 The massing and design of the building has been developed to complement the neighbouring buildings in a contemporary form which will enhance the overall character of the conservation area.
- 5.30 The choice of materials will complement the context with emphasis on the articulation of the deep set window and balconies appearing as spaces carved out from the masonry façade. The play of light and shadow that results from these carved elements will give a sense of gravitas to the buildings.
- 5.31 The proposed design will deliver an exemplar scheme which will significantly enhance the character and appearance of the site and the conservation area in accordance with the design principles set out in NPPF, the London Plan and the Local Plan.

Amenity

- 5.32 The size and layout of the residential accommodation is designed to meet the Nationally Described Space Standards ensuring that the internal amenity of future occupants is not compromised. The proposal also includes the provision of external private amenity space to the requisite standard.
- 5.33 The scheme has been designed to limit overlooking and any loss of daylight or sunlight to neighbouring properties (Appendix18).
- 5.34 The Noise Impact Assessment (Appendix12) concludes that the external building fabric will need to be carefully designed so that the existing noise climate does not exceed recommended internal levels. The external building fabric as proposed will contribute towards a significant reduction of ambient noise levels which in combination with a good quality double-glazed window configuration, will ensure that the internal noise levels for all residential environments of the development are commensurate with the recommendations of BS8233:2014. The assessment also confirms that the background noise profile of the area is dominated by road traffic noise from the High Street and that noise emissions from a car manoeuvring at low speed on the ramp to the basement would not present any noticeable increase in the noise profile of the area, and would therefore not pose any risk to the amenity of nearby residents, or future residents of the development
- 5.35 The Air Quality Assessment (Appendix13) indicates that overall and with mitigation measures in place, the construction and operational air quality impacts of the proposed development are judged to be not significant.

Transport – Accessibility and Parking

- 5.36 The highway adjoining the site and the surrounding roads are not currently in either a residents or a controlled parking zone and there is extensive provision of on-street car parking 'bays' with single yellow lines to deter all day parking. The single yellow line parking close to the site restricts any parking within the hours of 08:00 – 09:30, Monday to Friday.
- 5.37 The existing centrally located crossover vehicular access to the site is to be closed and a new access is to be formed at the south end of the frontage leading to the ramp to the basement car park, cycle and refuse stores. The access has been designed to be fully compliant with pedestrian and vehicular sight lines.
- 5.38 The Transport Statement (Appendix3) concludes that the site is well located and that all key services and destinations are accessible from the site, based on journeys of 30 minutes on foot, by bicycle and by public transport. The site is close by bus stops with frequent services on three routes and it is 1,200 metres from Fulwell Station. The TS notes that Census data indicates that c.33% of journeys to work locally are undertaken by public transport and that c.19% of journeys to work are made on foot or by bike.
- 5.39 The 45 car parking spaces in the basement, provided in line with extant standards. Of these, 20% will have access to electric charge points to support electric vehicles. A further 20% of spaces will be provided with passive provision for the installation of electric charge points in the future, should demand require.
- 5.40 The TS also concludes that the proposed provision is sufficient to accommodate the car parking demand associated with the development. It notes that Census data for the local area indicates that car ownership is, on average, just below 1 car per dwelling. The proposed provision means

that the development is designed to accommodate the predicted level of car ownership based on the census extrapolation without overspill onto the public highway.

- 5.41 Secure cycle stores are provided to comply with the London Plan's requirements.
- 5.42 As is the case with the existing development, refuse will be collected from a holding area adjacent to High Street. As there is no on-site service bay it is proposed that the retail units will not be permitted to be occupied for any food sales.
- 5.43 The assessment of flow shows that the potential traffic attraction of the development site will reduce by around 63 vehicle movements over the course of a day (07:00-19:00) when compared to the potential generation of the B1 office accommodation currently on the site.

Construction Traffic Generation

- 5.44 The potential impacts of construction traffic was a matter raised during the public consultation. This is discussed in the Transport Statement (Appendix3) and the Outline Construction Logistics Plan (Appendix**) which outlines the proposed routes for all site deliveries into and out of the site. The nearest major strategic route to the site is the A316 Twickenham Road/ Great Chertsey Road, which is part of the TfL Road Network (TLRN) and the preferred route into to the area by HGV traffic associated with the construction phase of the development. The primary route to the site from the A316 will be via the A312 Uxbridge Road to the junction with the A311. From here inbound traffic would turn left into High Street outbound vehicles would be the reverse. This would be a two-way route where it is possible for HGVs to turn around on site reducing impact on High Street and avoiding potential congestion at the junction of
- 5.45 The site is located within the London Lorry Control area which restricts vehicles over 18 tonnes before 7am and after 9pm, from Monday to Friday. On Saturday, the restriction is before 7am and after 1pm. The restriction applies all day on Sundays.
- 5.46 It is anticipated that the demolition, groundworks and piling stages will be the main attractors of lorry movements and the Construction Logistics Plan will require the appointed contractor to ensure that the movements are planned to be consistently spread throughout the day.
- 5.47 The estimate of the site traffic movement during the peak activity stage is 32 to 45 a day with an average of 5 – 7 movements per hour.
- 5.48 The Principal Contractor will be required contractually to adopt the practice and requirements of the Registered Considerate Contractor scheme with best practice as the minimum requirement. As part of this the contractor will be required to undertake a monthly review of all properties adjoining the site and to arrange for the cleaning of windows and paintwork soiled by dust created by building operations.

Trees and Biodiversity

- 5.49 An Ecological Assessment and the associated Desk Based Study (Appendix9A&9B) shows that there are no protected species on the site and low probability of bat habitat in the existing buildings.
- 5.50 The Arboricultural Survey and Report (Appendix5) concludes that while there are seven individual trees on the site the evident prolonged lack of management has rendered them in poor condition with one having died already. The report concludes that there are not considered to be any arboricultural constraints on the development of the site as the loss can be comprehensively mitigated by the provision of new trees as part of a robust landscaping scheme.

5.51 The proposed tree and other planting which is intended to enhance the biodiversity of the site and wider area is set out and described in the Landscape Design Statement (Appendix2).

5.52 As part of the pre-application consultation exercise we have discussed the scheme with, inter alia, the President of the Friends of Bushy and Home Parks. Initial observations raised concern as to whether the proposed development would give rise to light levels which would be disruptive to the fauna in Bushy Park, particularly Bats and Deer. The revised design of the roof story on the High Street frontage, which was introduced following the initial round of consultation, set back and reduced the extent of windows facing the Park and this was welcomed. An artificial lighting assessment (Appendix16) was also commissioned to review the existing condition, with lights in the existing buildings on and off, and review the proposed design. This concludes that the external and internal lighting of the proposed development will not have an adverse effect on the biodiversity of Bushy Park and when compared to the existing commercial development there should be an overall reduction of light spill from the building as perceived from within the Park.

Contamination

5.53 The Geoenvironmental Assessment (Appendix10A) notes that the ground works for the development will result in the removal of the upper 4-5 m of strata and that there is no scope for re-use of excavated materials on site. It states that most of the material to be removed will be uncontaminated comprising predominantly natural sands and gravels. There are no contaminants that cannot be remediated and there is no reason for the site not to be used for residential occupation.

Basement Impact Assessment

5.54 The Assessment (Appendix10B) reviews the potential impacts associated with the construction of the single depth basement across the full extent of the site. This considers the geotechnical ground conditions; groundwater and the hydrogeology and hydrology; flooding; drainage; impacts on underground structures in relation to the site and surrounding buildings and sets out the relevant temporary works required to effect the construction, including movement monitoring. There is nothing arising which indicates that the construction of the basement should not be undertaken.

Flood Risk

5.55 The site is in Zone 1 and therefore there is no requirement to prepare Sequential and Exception Tests.

5.56 The Flood Risk Assessment (Appendix11A) shows that the site is at low risk of flooding from all sources. It notes that the proposed drainage strategy complies with SuDS requirements significantly reducing surface water flood risk downstream.

Drainage Strategy

5.57 The design proposals in respect of the drainage for the development are described in the Drainage Strategy assessment report (Appendix11B). This concludes that there is adequate capacity in the existing public foul water sewer infrastructure to accommodate the expected requirements of the proposed development and there is no requirement for any enhancement of the existing infrastructure. It notes that the proposed surface water management strategy for the development seeks to maximize the use of SuDS providing irrigation to the installed

planting and that the planted areas will provide storage of surface water run-off and thereby mitigate the volume of surface water flow from the site.

- 5.58 The surface water flows will also be attenuated and restricted to the calculated Greenfield run off rates for the pre-developed site and Thames Water has confirmed acceptance in principle to the discharge rate proposed.

Energy and Sustainability

- 5.59 The development is designed to meet the three principles of the Energy Hierarchy: Be Lean; Be Clean; and Be Green and achieve the target of 35% reduction in CO₂ emissions. The considerations and calculations demonstrating this are set out in the Energy Statement (Appendix7).
- 5.60 The scheme incorporates passive and active provisions. The passive measures include enhanced building elements; low air permeability to reduce heating demand during winter periods; low solar energy transmittance to limit the impact of solar gain during the summer and passive ventilation. These provide a 8.1% carbon dioxide saving. Active measures include efficient lighting and daylight harvesting systems; efficient plant linked to a Building Energy Management System (BEMS) and mechanical heat recovery ventilation systems to achieve at least 80% efficient heat recovery. These provide a 2.8% carbon dioxide saving
- 5.61 Renewable energy will be provided with integrated photovoltaics as part of the sculpted roof design. This will provide a low carbon electrical total output of approximately 45kWp serving both the residential and non-residential parts of the development. This will provide a 24.3% carbon dioxide saving.
- 5.62 The requisite Sustainable Construction Checklist (SCC) is included in the Sustainability Statement (Appendix8A). This shows that based on the proposed specification both the non-residential and residential elements of the development achieve 71 points. For the non-residential element this equates to an 'A' rating which makes a major contribution towards achieving sustainable development in Richmond. For the residential element 71 points equates to an 'A+' rating where the project strives to achieve the highest standards in energy efficient sustainable development.
- 5.63 A BREEAM New-Construction 2014 Pre-Assessment (Appendix8B) has been completed, which, based on the proposed specification, shows that the non-residential element achieves an 'Excellent' rating.
- 5.64 A Home Quality Mark Pre-Assessment (Appendix8C) has also been completed which shows the proposals are fully in line with the overarching principles of sustainable development and the policy requirements of the Council.

Affordable Housing

- 5.65 Policy requirements in respect of the provision of affordable housing require such provision to be maximised subject to regard being had to the economic viability of the proposed development. The need for a scheme to be viable is to ensure that any requirement for the provision of any affordable accommodation should not render a scheme which would otherwise provide much needed new housing, non-viable. It is a primary tenant of policy that there is a need to encourage rather than restrain residential development.

- 5.66 To assess the maximum reasonable amount of affordable housing that any development can support it is necessary to undertake an objective viability assessment. Greatplanet Limited has commissioned Turner Morum to prepare the viability assessment submitted with the application (Appendix 14).
- 5.67 The need to encourage any developer to proceed with a scheme requires a subjective test so that the level of any provision does not seek to punish the developer still further by making him provide more affordable housing than the plainly objective viability assessment demonstrates can be delivered.
- 5.68 The submitted assessment demonstrates a lack of development viability for the provision of any affordable housing as part of the application scheme. Furthermore, there is no public subsidy available for the provision of affordable housing as part of this development.
- 5.69 The analysis illustrates deficits of £1.35m and £1.37m (per scenario) at 100% market Housing. This confirms that the scheme cannot technically support any category of affordable homes or an equivalent commuted sum payment.
- 5.70 Nevertheless it is the objective of the applicant that the development will be of a quality which is regarded as a landmark sustainable regeneration project within the London Borough of Richmond and accordingly a commercial decision has been taken to proceed at these sub-norm profit levels and to include four units to be made available as Starter Homes pursuant to the requirement of the Housing and Planning Act 2016 (Sections 1 to 8). Section 4 of the Act imparts a general duty on LPA's to promote the supply of starter homes which are an approved form of affordable housing and Government expects LPA's to work in a positive and proactive way with landowners and developers to secure a supply of land suitable for Starter Homes to deliver housing for first time buyers in their area.
- 5.71 As an alternative to the incorporation of the four starter home units an equivalent commuted sum payment of £123,000 towards the provision of affordable housing off site is offered.

Planning Obligations / CIL

- 5.72 A Section 106 will be submitted to address the following requirements:
- Affordable Starter Home provision or equivalent commuted sum payment
 - Covenant to restrict the Class A1 use to exclude food retail
 - Contribution towards the planting of new street trees
- 5.73 The Mayors and the Councils CIL will be payable in respect of the of the market housing and retail floor space

6.0 CONCLUSIONS

- 6.1 The assessment of the relevant planning policies shows that the scheme complies with all relevant policies.
- 6.2 The scheme is sustainable. It proposes carbon efficient construction, demonstrating proper and proportionate utilisation of scarce land resource in close proximity to public transport service which will deliver future occupants to places for work and leisure as well as being in an area well served with retail outlets, schooling, social and other community facilities.
- 6.3 As a consequence it will not result in adverse impacts which outweigh the two particular benefits: first the significant contribution it would make to meeting Richmond's and London's identified housing need and second by enhancing the conservation area in which it is located.
- 6.4 This becomes even more the case when the requirement of Policy 3.3 of the London Plan which expects the supply of new housing to exceed projections wherever and whenever possible and the fact that delivery of new housing is still significantly below the overall planned annual target across London the presumption in favour of granting permission for a highly sustainable development of outstanding design which will raise the standard of design more generally in the area most definitely must apply and should be given great weight.
- 6.5 The scheme addresses the core land use planning principles identified in the NPPF that ought to underpin decision taking in the planning system. In particular it:
- is a creative proposal which will improve the places in which people live their lives;
 - will deliver the homes, that Richmond, London and the country needs;
 - is a high quality design providing an excellent standard of amenity for all future occupants of the flats and houses;
 - provides a low carbon future in a changing climate;
 - is a location which enables the full use of public transport, walking and cycling.
- 6.6 **Accordingly planning permission should be granted subject to the conclusion of a section 106 Agreement in respect of the matters set out above.**