

Jones Lang LaSalle Incorporated

Former Hampton Police Station / Traffic Unit, 60-68 Station Road, Hampton, TW12 2AX

Planning Statement



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1 Introduction

1.1 This Planning Statement has been prepared by the Jones Lang LaSalle (“JLL”) Planning, Development & Heritage Team on behalf of our client, Hampton Care Home Ltd, to support the application for full planning permission for the development of the site for a new care home at Hampton Police Station, 60-68 Station Road in Hampton. The care home would provide a total of 67 care bed units, 22 care suites and associated facilities.

Format for Submission

1.2 This application comprises the following supporting documents:

- Planning Application fee and relevant forms (JLL)
- Design and Access Statement and technical drawings (PRC Architecture)
- Heritage Statement (The Built Heritage Consultancy)
- Transport Assessment, Travel Plan and Construction Management Statement (Paul Mew Associates)
- Structural Report (CWA)
- Flood Risk Assessment and Drainage Strategy (CWA)
- Foul Sewage Statement (CWA)
- Utilities Statement (Harniss Consulting)
- Sustainable Construction Checklist
- BREEAM Pre-Assessment (Ingleton Wood)
- Energy Report (Harniss Consulting)
- Preliminary Ecological Appraisal and Preliminary Bat Roost Assessment (Middlemarch Environmental)
- Acoustic Assessment (Noise Solutions Ltd)
- Air Quality Assessment (REC Ltd)
- Daylight and Sunlight report (Hodkinson)
- Health Impact Assessment (Hodkinson)
- Planning Needs Assessment (Carterwood)
- Land Contamination Report (LCM Environmental)
- Statement of Community Engagement (JLL)

Description of Development

1.3 The application seeks full planning permission for the following development:

“Retention and refurbishment of the former police station building with part demolition of rear wings and ancillary buildings, and the construction of a three storey side and rear extension and basement to form a

Class C2 registered care home comprising 22 care suites and 67 care bed units, with shared facilities, car and cycle parking, landscaping and ancillary works”

Project Rationale

- 1.4 The National Health Service and Community Care Act 1990 introduced major changes to the provision of residential care, including the care of the elderly. The Act introduced a new regulatory system and reforms aimed at providing higher standards of accommodation for residents. These changes have been a major influence on the provision of residential care and has led to a ‘shakeup’ of care providers with the subsequent loss of substandard accommodation at a time when the population of the UK is ageing.
- 1.5 Cinnamon is a UK healthcare investor specialising in senior residential care, nursing care and senior living properties, predominantly focused on investing in new care homes, purpose-built to the highest standards, for senior residents.
- 1.6 Cinnamon owns and operates 8 purpose-built care homes and 6 care homes developed by Cinnamon Care Capital are leased to other care home operators throughout the UK. Cinnamon is now developing a number of schemes which offer a range of care accommodation with developments currently on site in Bromsgrove and Hextable.
- 1.7 A recent, similar development by Cinnamon Care Collection is currently in progress at the York Court care home in Battersea (‘the Battersea scheme’). The scheme (reference 2016/5617) was permitted in August 2017, and was for “alterations and extensions to existing (Class C2) care home, including the creation of two additional storeys at third and fourth floor, single-storey side extension and partial infill of existing courtyard to provide a 108-bed care home (78 care beds and 30 new assisted living suites”. The facility is registered with the Care Quality Commission (CQC), and, as a nursing home, provides individual en-suite bedrooms, assisted bathrooms, resident’s lounges and further communal facilities. Care services will be provided by staff, available 24 hours a day. On the basis of the development falling into Use Class C2, the scheme was permitted based on no provision of affordable housing.
- 1.8 In each location, the intention is to operate a best-in-class care facility to the highest care rating from the Care Quality Commission. All residents must meet qualifying criteria and prior to occupation all prospective residents will have a needs assessment to ensure they meet the qualifying criteria and the Home can accommodate their care needs. Qualifying criteria will include a minimum age restriction and the need for some form of care.

Statement Structure

- 1.9 This Planning Statement is set out as follows:
 - Section 2 - Site, Current Use and Surrounding Area;
 - Section 3 – The Proposal;

- Section 4 – Planning Policy Context;
- Section 5 – The Case for Permission;
- Section 6 - Conclusion;

2 Site, Current Use and Surrounding Area

Site and Surrounding Area

- 2.1 The 0.7 ha site is located on the north side of Station Road in Hampton. The site comprises the former Metropolitan Police Station building that was constructed in 1905, and a number of ancillary buildings and garages to the rear. The building fronts onto Station Road to the south. The existing building has an 'L' shaped footprint, which surrounds an open car park to the front of the site.



Figure 2.1: Site Location. *Source: PRC Architecture*

- 2.2 The former Police Station is a locally listed building (a Building of Townscape Merit) and is located within the Hampton Village Conservation Area.
- 2.3 To the north of the site, there is a large public open park (Beveree Sports Ground), which is designated as 'Other Open Land of Townscape Importance'.
- 2.4 To the west, there are a number of residential and commercial units of 2-3 storey in height, and to the east there are a number of single-storey residential cottages (Queen's Bench Cottages), which are also locally listed.
- 2.5 To the east are Grade II listed residential properties at 54-46 Station Road, 3-storey in height.
- 2.6 The area immediately to the west of the site comprises mixed use development, with small retail units on the ground floor, and residential uses on the upper floors.

- 2.7 To the east and south east of the site, the area comprises predominantly residential properties, characterised by 19th Century buildings.
- 2.8 The site is located within the heart of Hampton Village centre. Access is located to the northern side of Station Road, which provides amenities including a number of local shops and transport facilities.
- 2.9 Hampton Court Road / Thames Street / Upper Sunbury Road (A308) is the primary route through the borough running east-west from Hampton Court Palace to Junction 1 of the M3 at Sunbury. Station Road is accessed indirectly through Hampton from the High Street.
- 2.10 The site has a Public Transport Accessibility Level (PTAL) of 2, on a scale where 0 is the least accessible and 6b is the most accessible. With regard to local transport amenity, Hampton railway station is approximately 500m to the west of the site, alongside Station Road.
- 2.11 The site is understood to be located within an area of mixed use (Hampton Village) and within the Hampton Village Conservation Area. Station Road is classed as a local distributor road and Beveree Sports Field to the north is classed as a ‘other open land of townscape importance’.



Figure 2.2: Planning designations for the site and wider area. *Source: LBRuT.*

Planning History

2.12 A desk-based planning history search for the application site was undertaken via the Council’s online statutory records, the results of which are shown below.

Application Ref	Description of Development	Decision
16/0606/NMA	Retention of former police station building with partial demolition of the rear wings of the police station and demolition of the rear garages and the construction of 28 residential units (4 x 1 bedroom, 12 x 2 bedroom, 10 x 3 bedroom and 2 x 4 bedroom) and associated access, servicing, cycle parking and landscaping (The proposal has been amended to include setting back the top floor away from the eastern boundary of the site; roof design on Plots 24 to 28 amended; and amendments to unit mix). [Non-Material Amendment application to planning permission 16/0606/FUL to make amendments to condition DV42].	Pending - Decision Due 3 rd September 2019
16/0606/FUL	Retention of former police station building with partial demolition of the rear wings of the police station and demolition of the rear garages and the construction of 28 residential units (4 x 1 bed, 7 x 2 bed, 10 x 3 bed and 7 x 4 bed) and associated access, servicing, cycle parking and landscaping.	Approved September 2016
08/1853/FUL	Erection of fence/railings to perimeter wall, Hampton Police station and traffic garage	Approved May 2008
97/0150	Installation of an electrically operated sliding gate at main entrance with timber infill panels	Approved January 1997

2.13 Pertinent to this planning is application 16/0606/FUL which was granted permission in September 2016 and sought the partial demolition of the rear wings of the police station, demolition of ancillary buildings and construction of 28 residential units.

2.14 The latest application that was granted in September 2016, was for the provision of 28 residential units with a mixture of one to four-bedroom properties over two to three stories around a central courtyard alongside associated car and cycle parking. The properties included:

- 14 x new build houses
- 6 x new build apartments
- 6 x refurbished apartments

- 2 refurbished houses

2.15 The committee report for the scheme (February 2016) identifies that the proposal was considered an appropriate form, mass and scale of development in the context, and meets the requirements proposed within the Local Plan for the setting of the Conservation Area and Listed Buildings.

2.16 The loss of the employment use was accepted as part of this residential permission.

2.17 In relation to the provision of affordable housing, the viability study provided with the previous application stated that due to the size of the site, affordable housing provision would make the site unviable. The Council agreed and determined that affordable housing could not be reasonably pursued in this case.

2.18 The proposal was considered appropriate for the following reasons:

- Residential was advocated by the Council in a site allocations plan which was never formally adopted, but was proposed when the scheme was initially proposed.
- The former police station is a Building of Townscape Merit and the historic elements of it were to be retained.
- The viability report outlined that the scheme would not be viable if the inclusion of affordable housing was involved.

2.19 LBRuT Planning Officers in their summary of application 16/0606/FUL stated the following with regards to the application:

'The site was formerly used by the police as their traffic unit for parking and maintaining cars. It was later used to maintain their historical collection of cars. It has now been declared surplus to requirements. This application seeks permission for a residential development with a mix of flats and houses....the former police station is a Building of Townscape Merit and the historic elements of it are to be retained. There is to be a new apartment block also fronting Station Road with houses to the rear arranged around a courtyard area which is to provide communal amenity space and a play area. The design, scale and massing are considered to be appropriate to the site and its surroundings...the proposal meets the normal car parking standards and the finished development would not result in a significant increase in traffic on Station Road.'

2.20 This permission has formed the design basis for the proposed development, as outlined in Section 3 of this Statement.

3 The Proposal

- 3.1 This section outlines the details of the development proposal. Further detail is set out within the Design and Access Statement and drawings submitted with this application.

Description of the development

- 3.2 The proposed scheme seeks planning permission for:

“Retention and refurbishment of the former police station building with part demolition of rear wings and ancillary buildings, and the construction of a three storey side and rear extension and basement to form a Class C2 registered care home comprising 22 care suites and 67 care bed units, with shared facilities, car and cycle parking, landscaping and ancillary works”

Detailed Design

- 3.3 The proposed development has been carefully designed to be sympathetic to the local townscape and character, neighbouring properties and local amenity. The design has been considered in light of the previously permitted residential scheme at the site (application reference 16/0606/FUL) and has formed the basis for the design proposed.

Accommodation

- 3.4 The proposed care home seeks to provide accommodation for 94 persons, comprising 22 care suites and 67 care bed units within a three storey plus basement building. All 67 care beds units will be one-bedroom. Of the 22 care suites proposed, 17 will be one-bedroom and 5 will be two-bedroom.
- 3.5 The residential part of the care home is to be located at lower ground, ground and first floor levels. The majority of care bedrooms have either west, south or eastern aspects. The proposed care suites are situated on the second floor and are also contained within the extended and converted former police station.
- 3.6 The proposed development will include a reception, café/bistro, lounge and dining areas, together with courtyard gardens and a roof terrace. The total GIA of the proposed development will be 5,058m². Further information regarding the accommodation proposed as part of the development is outlined below and in the accompanying Design and Access Statement.

The Care Home offer

- A facility registered with the Care Quality Commission (CQC) as a Nursing Home with regulated accommodation for persons who require nursing and personal care which shall include:
 - Individual ensuite bedrooms with shower

- Resident lounges and dining rooms
- Assisted bathroom and WC's
- External private terraces; and

Central facilities including:

- Commercial kitchen
 - Laundry
 - Administrative facilities
 - Reception
 - Nurse Stations
- Access to the non-registered communal facilities detailed below:
 - Individually tailored care services provided by qualified nursing and care staff available 24 hours a day.
 - All meals, drinks and light snacks prepared and served to residents.
 - Housekeeping services including cleaning of all areas.
 - Laundry service for linen and personal clothing.
 - Daily activities and exercise programme arranged by dedicated activities coordinator.
 - Each resident will subscribe to their accommodation and care services on a fully inclusive basis.

The Care Suites offer

- Individual suites designed for residents in need of care.
- Access to communal facilities to include:
 - Main Reception
 - Café
 - Central Care Office
 - Residents Lounge/ Dining and lounge
 - Hairdresser/Beauty Salon
 - Internal landscaped courtyard and roof terrace

- Access to 24 hour domiciliary care service registered with CQC.
- Access to additional care services including:
 - Personal care including assistance with washing, dressing and movement
 - Medical care including changing dressings and other services to be carried out by nursing staff
 - Provision of meals in the suites or the restaurant
 - Hair and beauty including hairdressing, nail and beauty treatments
 - Laundry service including clothing and bedding
 - Housekeeping including cleaning and changing bedding
 - Full range of maintenance services from minor tasks such as changing light bulbs through to major repairs
 - Assistance with internet/WiFi
 - Social activities organised jointly between the Care Home and the Care Suites
 - General concierge service
- Monitoring by care staff 24 hours a day. Each Suite will have an alarm system to allow occupiers to contact the care staff at any time. The alarm service can be used in medical emergencies. Care staff would provide first response aid and call an ambulance if needed.
- The suites will be let on either a short or long term Lease.
- Occupiers of the Care Suites will pay a service charge to cover the use of the communal facilities which will include the provision of the basic domiciliary care service. The additional care services noted above will be provided on a menu basis.

Materials

3.7 The proposed materials are as follows:

- Roof- slate or similar in keeping with the conservation area within which the site lies;
- Walls- red brick at the front with London stock to the rear;
- Cills/ arches- stonework; and
- Windows- white timber.

- 3.8 The selection of construction materials for the scheme has been undertaken from a whole life-cycle perspective that has considered the supply chain, durability, longevity and economic viability.

Access and Parking

- 3.9 A total of 14 car parking spaces is proposed, including one disabled access space, one enlarged parking bay and three electric vehicle charging spaces. This is a significant reduction on the number of existing car parking spaces at the site (34 spaces).
- 3.10 22 cycle parking spaces are to be provided. 16 long-stay covered spaces are to be provided in a secure sheltered store whilst 6 short-stay visitor parking spaces will be provided through the provision of Sheffield stands to the front of the site.
- 3.11 The existing dropped kerb vehicle access to the front of the site off Station Road will be retained to serve the proposed developments. Vehicles using the car park will enter and exit the site from the eastern access. Delivery/servicing vehicles will access the site from the western access and egress the site from the eastern access.
- 3.12 The main entrance to the care home will be located towards the front of the site and will provide access to the care home's reception area and lobby. A secure door will lead to the ground floor care accommodation and a lift is available for access to all floors.

Servicing and Waste

- 3.13 As previously noted, delivery/servicing vehicles will access the site from the western access and egress the site from the eastern access. The development will generate two regular demands for servicing, that being delivery of goods and collection of waste and recycling.
- 3.14 It is envisaged that there will be five to six deliveries per day at the site.
- 3.15 A waste storage area is to be provided adjacent to the access to the rear car parking area. Waste is proposed to be collected on-site within the loading/unloading area at the front of the site. Collection of waste will occur approximately three times a week.
- 3.16 Further information on the design proposals can be found within the Design and Access Statement which accompanies the application.

4 Planning Policy Context

4.1 The following section summarises the national and local planning policy framework that is relevant for the determination of this application.

Statutory Considerations

4.2 The National Planning Policy Framework (NPPF) (adopted July 2018) is a material consideration and sets national governmental planning policy, alongside associated planning practice guidance.

4.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that applications for development must be determined in accordance with the development plan unless material considerations indicate otherwise. In this context, the statutory development plan for LBRuT comprises the following:

- LBRuT Local Plan (2018);
- Local Policies Map (2018);
- London Plan (2016); and
- Joint West London Waste Plan (2015).

4.4 Other material considerations which should be taken into account including the NPPF (2019), NPPG, Supplementary Planning Documents (SPDs), Supplementary Planning Guidance (SPGs) and emerging planning policy where relevant.

NPPF 2019

4.5 The NPPF was adopted on February 2019 by the Government and replaced the previous versions adopted in 2018 and 2012. The Policy Framework is considered fundamental to Government reforms to promote economic growth and make the planning system more accessible.

4.6 The NPPF sets out the Government's overarching economic, environmental and social planning policies in England and how these are expected to be applied. The NPPF does not change the statutory status of the Development Plan as the starting point for decision making however, it is a material consideration for local planning authorities in the determining of planning applications.

General Approach

4.7 At the heart of the NPPF is a "*presumption in favour of sustainable development*" (**paragraph 11**).

4.8 **Paragraph 11** states that plans and decisions should apply a presumption in favour of sustainable development and that for decision makers this means "*approving development proposals that accord with an up-to-date development plan without delay*".

- 4.9 **Paragraph 38** states that *“local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available...and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible”*.

Housing for older people

- 4.10 **Paragraph 61** states with regards to delivering homes, that *“within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).”*

- 4.11 **Paragraph 64** states with regard to affordable housing provision, *“exceptions to this 10% (affordable housing) requirement should also be made where the site or proposed development:*

b) provides specialist accommodation for a group of people with specific needs (such as purpose-built accommodation for the elderly or students).”

- 4.12 **Tables 3.1 and A5.1** of the London Plan makes clear that LBRuT should deliver 315 homes and 135 specialist housing units for older people per annum and that within LBRuT there was approval for 5 care home bedrooms in 2016/2017.

Use of Alternative and Brownfield land

- 4.13 **Paragraph 118 part c** states that substantial weight should be given *“to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.”*

- 4.14 **Paragraph 121** states that *“local planning authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs. In particular, they should support proposals to... make more effective use of sites that provide community services such as schools and hospitals, provided this maintains or improves the quality of service provision and access to open space.”*

Design

- 4.15 **Paragraph 124** states that *“the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is*

effective engagement between applicants, communities, local planning authorities and other interests throughout the process.”

4.16 **Paragraph 127** states that *“planning decisions should ensure that developments:*

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”*

Heritage

4.17 Paragraph 189 states that *“In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.”*

4.18 Paragraph 195 states that *“where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:*

- a) the nature of the heritage asset prevents all reasonable uses of the site; and*
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*

c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and

d) the harm or loss is outweighed by the benefit of bringing the site back into use.”

4.19 Paragraph 196 makes clear that *“where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”*

4.20 Paragraph 197 goes on to state that *“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”*

London Plan (2016)

4.21 The London Plan is the overall strategic plan for London.

4.22 It sets out a fully integrated economic, environmental, transport and social framework for the development of the capital to 2036 and forms part of the development plan for Greater London. London boroughs’ local plans need to be in general conformity with the London Plan, and its policies guide decisions on planning applications by Councils and the Mayor.

Housing

4.23 **Policy 3.1** ‘Ensuring Equal Life Changes For All’ identifies the requirement to meet the needs for all Londoners. Development proposals should protect and enhance facilities and services than meet the needs of particular groups and communities.

4.24 **Policy 3.2** ‘Improving Health and Addressing Health Inequalities’ advises that the potential impact of development proposals on health and health inequalities in London will be considered. Proposals should promote London as a ‘healthy place for all’. New developments should therefore be designed, constructed and managed in ways to improve health and promote healthy lifestyles to help reduce health inequalities.

4.25 **Policy 3.3** ‘Increasing Housing Supply’ recognises the need for more homes in London in order to promote opportunity and provide a real choice for all. Housing development should contribute to the provision of at least 42,000 net additional homes per year.

4.26 **Policy 3.8** ‘Housing Choice’ states that Londoners should have a choice of homes that they can afford and which meet their requirements. In the preparation of plans and planning decisions, planning authorities should identify the range of needs likely to arise in their area, and ensure that new developments ‘offer a range of housing choices, in terms of mix of housing sizes and types’, taking into account the ‘requirements

of different groups and the changing roles of different sectors in meeting these'. Within the policy, account is taken of the 'changing age structure of London's population', and, in particular, the 'varied needs of older Londoners'.

- 4.27 **Paragraph 3.50** goes on to state that the Mayor has identified the growing and changing requirements for housing older people in London as one of the most important emerging planning issues for London. It is anticipated that between 2011 and 2036 'over 65s' could increase by 64% and 'over 90s' could grow in number by 89,000.
- 4.28 **Paragraph 3.50B** also outlines that the choices open to older Londoners to move into local specialist housing may have been constrained through inadequate supply. Over the period 2015-2025 older Londoners may require 3,600-4,200 new specialist units per annum and 400-500 new bedspaces per year in care homes. The policy acknowledges that *"extending these choices through a higher level of specialist provision will in turn free up larger homes for family occupation."*
- 4.29 **Policy 3.17** 'Health and Social Care Facilities' identifies that the London Plan supports the provision of high quality health and social care 'appropriate for a growing and changing population', particularly in areas of under provision or where there are particular needs. Development proposals that provide high quality health and social care facilities will be supported.

Design

- 4.30 **Policy 5.3** 'Sustainable construction and design' states that *"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."*
- 4.31 **Policy 7.1** 'Lifetime Neighbourhoods' states the following:
- *"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, the Blue Ribbon Network, local shops, employment and training opportunities, commercial services and public transport."*
 - *Development should enable people to live healthy, active lives; should maximise 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.*
 - *The design of new buildings and spaces they create should reinforce or enhance the character, legibility, permeability and accessibility of the neighbourhood."*

4.32 **Policy 7.4** ‘Local character’ states that *“development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings...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*
- d) allows existing buildings and structures that make a positive contribution to the character of a place to influence the future character of the area*
- e) is informed by the surrounding historic environment.”*

4.33 **Policy 7.6** ‘Architecture’ states that *“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...Buildings and structures should:*

- 1) be of the highest architectural quality;*
- 2) be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm;*
- 3) comprise details and materials that complement, not necessarily replicate, the local architectural character;*
- 4) not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings;*
- 5) incorporate best practice in resource management and climate change mitigation and adaptation;*
- 6) provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces;*
- 7) be adaptable to different activities and land uses, particularly at ground level;*
- 8) meet the principles of inclusive design; and*

9) *optimise the potential of sites.*”

Heritage

4.34 **Policy 7.8** ‘Heritage Assets and Archaeology’ states that:

- *“Development should identify, value, conserve, restore, reuse and incorporate heritage assets, where appropriate.*
- *Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.*
- *New development should make provision for the protection of archaeological resources, landscapes and significant memorials. The physical assets should, where possible, be made available to the public on-site. Where the archaeological asset or memorial cannot be preserved or managed on-site, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset.”*

Energy and Sustainability

4.35 **Policy 5.2** ‘Minimising Carbon Dioxide Emissions’ states that *“development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:*

1. *Be Lean: Use less energy*
2. *Be Clean: Supply energy efficiently*
3. *Be Green: Use renewable energy*

Major development proposals should include a detailed energy assessment to demonstrate how the targets for carbon dioxide emissions reduction outlined above are to be met within the framework of the energy hierarchy.”

Policy 5.3 ‘Sustainable Design and Construction’ states that *“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.*

Policy 5.3 goes on to state that *“Major development proposals should meet the minimum standards outlined in the Mayor’s supplementary planning guidance and this should be clearly demonstrated within a design and access statement. The standards include measures to achieve other policies in this Plan and the following sustainable design principles:*

- *minimising carbon dioxide emissions across the site, including the building and services (such as heating and cooling systems)*
- *avoiding internal overheating and contributing to the urban heat island effect*
- *efficient use of natural resources (including water), including making the most of natural systems both within and around buildings*
- *minimising pollution (including noise, air and urban runoff)*
- *minimising the generation of waste and maximising reuse or recycling f avoiding impacts from natural hazards (including flooding)*
- *ensuring developments are comfortable and secure for users, including avoiding the creation of adverse local climatic conditions*
- *securing sustainable procurement of materials, using local supplies where feasible, and*
- *promoting and protecting biodiversity and green infrastructure.”*

4.36 **Policy 5.7** ‘Renewable Energy’ states that *“within the framework of the energy hierarchy, major development proposals should provide a reduction in expected carbon dioxide emissions through the use of on-site renewable energy generation, where feasible”*.

4.37 **Policy 5.9** ‘Overheating and Cooling’ states *“major development proposals should reduce potential overheating and reliance on air conditioning systems and demonstrate this in accordance with the following cooling hierarchy:*

1. *Minimise internal heat generation through energy efficient design*
2. *Reduce the amount of heat entering a building in summer through orientation, shading, albedo, fenestration, insulation and green roofs and walls*
3. *Manage the heat within the building through expose internal thermal mass and high ceilings*
4. *Passive ventilation*
5. *Mechanical ventilation*
6. *Active cooling systems.”*

In addition, the policy states that *“major development proposals should demonstrate how the design, materials, construction and operation of the development would minimise overheating and also meet its cooling needs.”*

Transport

4.38 **Policy 6.3** ‘Assessing effects of development on transport capacity’ states that *“development proposals should ensure that impacts on transport capacity and the transport network, at both a corridor and local level, are fully assessed. Development should not adversely affect safety on the transport network.”*

Flood Risk and Drainage

4.39 **Policy 5.12** ‘Flood Risk Management’ states that *“development proposals must comply with the flood risk assessment and management requirements set out in the NPPF and the associated technical guidance on flood risk over the lifetime of the development and have regard to measures proposed in Thames Estuary 2100 and Catchment Flood Management Plans.”*

4.40 **Policy 5.13** ‘Sustainable Drainage’ states that *“development should utilise sustainable urban drainage systems unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible in line with the following hierarchy:*

1. *Store rainwater for later use*
2. *Use infiltration techniques such as porous surfaces in non-clay areas*
3. *Attenuate rainwater in ponds or open water features for gradual release*
4. *Attenuate rainwater by storing in tanks or sealed water features for gradual release*
5. *Discharge rainwater direct to a watercourse*
6. *Discharge rainwater to a surface water sewer/drain*
7. *Discharge rainwater to the combined sewer”*

Noise

4.41 **Policy 7.15** ‘Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes’ states that 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;*
- b) *mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on development or adding unduly to the costs and administrative burdens on existing businesses;*
- c) *improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity);*
- d) *separating new noise sensitive development from major noise sources (such as road, rail, air transport and some types of industrial development) through the use of distance, screening or internal layout – in preference to sole reliance on sound insulation;*

- e) *where it is not possible to achieve separation of noise sensitive development and noise sources, without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through the application of good acoustic design principles;*
- f) *having particular regard to the impact of aviation noise on noise sensitive development;*
- g) *promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.”*

Air Quality

4.42 **Policy 7.14** ‘Improving Air Quality’ states that “*development proposals should:*

- *minimise increased exposure to existing poor air quality and make provisions to address local problems of air quality, through means such as design solutions, buffer zones or steps to promote greater use of sustainable transport modes through travel plans;*
- *promote sustainable design and construction to reduce emissions from the demolition and construction of buildings following best practice guidance in the GLA and London Councils.*
- *developments should be at least ‘air quality neutral’ and not lead to further deterioration of existing poor air quality (such as areas designated as AQMAs);*
- *ensure that where provision is needed to reduce emissions from a development, this is usually made on-site; and*
- *where the development requires a detailed air quality assessment and biomass boilers are included, the assessment should forecast pollutant concentrations.”*

Biodiversity

4.43 **Policy 7.19** ‘Biodiversity and Access to Nature’ states that “*development proposals should:*

- *Wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity;*
- *Prioritise assisting in achieving targets in biodiversity action plans and/or improving access to nature in areas deficient in accessible wildlife sites;*
- *Not adversely affect the integrity of European sites and be resisted where they have significant adverse impact on European or nationally designated sites or on the population or conservation*

status of a protected species or a priority species or habitat identified in a UK, London or appropriate regional BAP or borough BAP.”

Waste

- 4.44 **Policy 5.3** ‘Sustainable Design and Construction’ states that *“all major development should... minimise the generation of waste and maximising reuse or recycling.”*
- 4.45 **Policy 5.17** ‘Waste Capacity’ states that *“suitable waste and recycling storage facilities are required in all new developments.”*

LBRuT Local Plan (2018)

Housing for Older People

- 4.46 **Supporting paragraph 3.1.25** states *“the Council also supports the creation of environments and a public realm that are inclusive and accessible for the older population, including for those with dementia, and enable the older population to remain independent and active for longer.”*
- 4.47 **Policy LP30** ‘Health and Wellbeing’ states *“the Council will support development that results in a pattern of land uses and facilities that encourage:*
1. *An inclusive development layout and public realm that considers the needs of all, including the older population and disabled people.”*
- 4.48 **Supporting paragraph 8.3.9** states *“the borough has the highest proportion of people aged over 75 and living alone in London and there are increasing numbers of older people living at home with long term physical and mental conditions such as dementia. Planning can play a role in the creation of environments and a public realm that inclusive and accessible for the older population, including for those with dementia.”*
- 4.49 **Policy LP37** ‘Housing Needs of Different Groups’ states that *“planning permission will be granted for new accommodation where housing is providing for an identified local need, across a range of tenures, providing they are on a site and in a location suitable for that particular use, and in accordance with environmental, transport, parking and other relevant policies”.*
- 4.50 **Supporting paragraph 9.4.2** states that *“the range of housing to meet specific community needs can include sheltered housing with care support, staffed hostels, residential care homes/nursing homes, extra-care housing, provision by local colleges, hotels and other institutions for their students and/or staff. These include supported housing provision for children, older persons and other client groups.”*

60-68 Station Road (Hampton Traffic Unit)

4.51 **Policy SA3** ‘Hampton Traffic Unit’ relates specifically to the subject site and states:

“Appropriate land uses include business (B1), employment generating and other commercial or social and community infrastructure uses. The Building of Townscape Merit should be retained and a pedestrian link should be provided through the site.”

Design

4.52 **Policy LP1** ‘Local Character and Design Quality’ states *“the Council will require all development to be of high architectural and urban design quality. The high quality character and heritage of the borough and its villages will need to be maintained and enhanced where opportunities arise. Development proposals will have to demonstrate a thorough understanding of the site and how it relates to its existing context, including character and appearance, and take opportunities to improve the quality and character of buildings, spaces and the local area.”*

4.53 **Supporting paragraph 9.4.16** states that *“high quality design standards, relevant to client needs, will be expected, including inclusive design and provision of internal and external space. For example older peoples accommodation should address specific needs such as storage of electric buggies in dry locations, increasing wheelchair housing and turning circles for day centre buses.”*

4.54 **Policy LP2** ‘Building Heights’ states that *“the Council will require new buildings, including extensions and redevelopment of existing buildings, to respect and strengthen the setting of the borough’s valued townscapes and landscapes, through appropriate building heights.”*

4.55 **Policy LP8** ‘Amenity and Living Conditions’ states that *“all development will be required to protect the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties. The Council will:*

1. ensure the design and layout of buildings enables good standards of daylight and sunlight to be achieved in new development and in existing properties affected by new development; where existing daylight and sunlight conditions are already substandard, they should be improved where possible;

2. ensure balconies do not raise unacceptable overlooking or noise or disturbance to nearby occupiers; height, massing or siting, including through creating a sense of enclosure;

3. ensure that proposals are not visually intrusive or have an overbearing impact as a result of their height, massing or siting, including through creating a sense of enclosure;

4. ensure there is no harm to the reasonable enjoyment of the use of buildings, gardens and other spaces due to increases in traffic, servicing, parking, noise, light, disturbance, air pollution, odours or vibration or local micro-climatic effects.”

4.56 **Policy LP 22** ‘Sustainable Design and Construction’ outlines the need for all developments to achieve the highest standards of sustainable design and construction, to meet BREEAM ‘Excellent’ for new non-residential buildings over 100sqm and to complete the Sustainable Construction Checklist SPD.

Heritage

4.57 **Policy LP3** ‘Designated Heritage Assets’ states *“the Council will require development to conserve and where possible take opportunities to make a positive contribution to, the historic environment of the borough. Development proposals likely to adversely affect the significance of heritage assets will be assessed against the requirement to seek to avoid harm and the justification for the proposal. The significance (including the settings) of the borough’s designated heritage assets, encompassing Conservation Areas, listed buildings... will be conserved and enhanced...”*

4.58 *It also goes on to state that the Council will “resist substantial demolition in Conservation Areas and any changes that could harm heritage assets, unless it can be demonstrated that:*

- 1) *In the case of substantial harm or loss to the significance of the heritage asset, it is necessary to achieve substantial public benefits that outweigh that harm or loss;*
- 2) *In the case of less than substantial harm to the significance of the heritage asset, that the public benefits, including securing the optimum viable use, outweigh that harm; or*
- 3) *The building or part of the building or structure makes no positive contribution to the character of distinctiveness of the area.”*

4.59 **Policy LP4** ‘Non-designated Heritage Assets’ states that *“the council will seek to preserve and where possible enhance, the significance, character and setting of non-designated heritage assets, including Buildings of Townscape Merit, memorials, particularly war memorials and other local historic features. There will be a presumption against the demolition of Buildings of Townscape Merit.”*

Development in Centres

4.60 **Policy LP25** ‘Development in Centres’ specifically designated Hampton Village as a local centre and states that

“Development in the borough’s centres, as defined in the centre hierarchy, will be acceptable if it:

- *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 (also see the Spatial Strategy of this Plan); and*
- *for other appropriate uses (see B & C below), major development and/or developments which generate high levels of trips should be located within a Main Centre Boundary. Elsewhere development should be located within the defined Area of Mixed Use (AMU boundary). For centres, or*

parts of centres where no boundary exists, proposals should be well-related to designated shopping frontages.

- *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.*

4.61 With regard to local centres such as Hampton Village, the policy states that *“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. Development should, wherever possible, include overall improvements and enhancements of the small centres where appropriate, and/or modernise outdated premises.”*

Air Quality

4.62 Policy LP10 ‘Local Environmental Impacts, Pollution and Land Contamination’ states that *“the Council promotes good air quality design and new technologies. Developers should secure at least ‘Emissions Neutral’ development. To consider the impact of introducing new developments in areas already subject to poor air quality, the following will be required:*

- 1. an air quality impact assessment, including where necessary, modelled data;*
- 2. mitigation measures to reduce the development’s impact upon air quality, including the type of equipment installed, thermal insulation and ducting abatement technology;*
- 3. measures to protect the occupiers of new developments from existing sources;*
- 4. strict mitigation for developments to be used by sensitive receptors such as schools, hospitals and care homes in areas of existing poor air quality; this also applies to proposals close to developments used by sensitive receptors.”*

Noise

4.63 Policy LP10 ‘Local Environmental Impacts, Pollution and Land Contamination’ states that *“the Council encourages good acoustic design to ensure occupiers of new and existing noise sensitive buildings are protected. The following will be required, where necessary:*

- 1. a noise assessment of any new plant and equipment and its impact upon both receptors and the general background noise levels;*
- 2. mitigation measures where noise needs to be controlled and managed;*

3. *time limits and restrictions for activities where noise cannot be sufficiently mitigated;*
4. *promotion of good acoustic design and use of new technologies;*
5. *measures to protect the occupiers of new developments from existing sources.”*

Construction and demolition

4.64 **Policy LP10** ‘Local Environmental Impacts, Pollution and Land Contamination’ states that *“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 (CMS) 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.”*

Basement Development

4.65 **Policy LP11** ‘Subterranean developments and basements’ states that *“the Council will resist subterranean and basement development of more than one storey below the existing ground level to residential properties or those which were previously in residential use. Proposals for subterranean and basement developments will be required to comply with the following:*

1. *extend to no more than a maximum of 50% of the existing garden land or more than half of any other undeveloped garden area (this excludes the footprint of the original building)*
2. *Demonstrate the scheme safeguards the structural stability of the existing building, neighbouring buildings and other infrastructure, including related to the highway and transport; a Structural Impact Assessment will be required where a subterranean development or basement is added to, or adjacent to, a listed building.*
3. *use natural ventilation and lighting where habitable accommodation is provided;*
4. *include a minimum of 1 metre naturally draining permeable soil above any part of the basement beneath the garden area, together with a minimum 200mm drainage layer, and provide a satisfactory landscaping scheme;*

5. demonstrate that the scheme will not increase or otherwise exacerbate flood risk on the site or beyond, in line with policy LP 21 Flood Risk and Sustainable Drainage;

6. 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 (in line with the Local Environmental Impacts, Pollution and Land Contamination policy of this Plan);

Proposals for subterranean and basement developments, including extensions, as well as lightwells and railings, will be assessed against the advice set out in the Council's SPDs relating to character and design as well as the relevant Village Planning Guidance and the forthcoming SPD on Basements and Subterranean Developments. Applicants will be expected to follow the Council's Good Practice Guide on Basement Developments."

Energy and sustainability

4.66 **Policy LP 20** 'Climate Change Adaption' states that *"the Council will promote and encourage development to be fully resilient to the future impacts of climate change in order to minimise vulnerability of people and property.*

New development, in their layout, design, construction, materials, landscaping and operation, should minimise the effects of overheating as well as minimise energy consumption in accordance with the following cooling hierarchy:

- 1. minimise internal heat generation through energy efficient design*
- 2. reduce the amount of heat entering a building in summer through shading, reducing solar reflectance, fenestration, insulation and green roofs and walls*
- 3. manage the heat within the building through exposed internal thermal mass and high ceilings*
- 4. passive ventilation*
- 5. mechanical ventilation*
- 6. active cooling systems (ensuring they are the lowest carbon options).*

Opportunities to adapt existing buildings, places and spaces to the likely effects of climate change should be maximised and will be supported."

4.67 **Policy LP22** 'Sustainable Design and Construction' states that *"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 major residential developments (10 units or more) should achieve zero carbon standards in line with London Plan policy.*
- 2. All other new residential buildings should achieve a 35% reduction.*
- 3. All non-residential buildings over 100sqm should achieve a 35% reduction. From 2019 all major nonresidential buildings should achieve zero carbon standards in line with London Plan policy. Targets are expressed as a percentage improvement over the target emission rate (TER) based on Part L of the 2013 Building Regulations.*

This should be achieved by following the Energy Hierarchy:

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

4.68 Policy LP 22 goes on to state with regards to decentralised energy networks that “the Council requires developments to contribute towards the Mayor of London target of 25% of heat and power to be generated through localised decentralised energy (DE) systems by 2025. The following will be required:

- 1. All new development will be required to connect to existing DE networks where feasible. This also applies where a DE network is planned and expected to be operational within 5 years of the development being completed.*
- 2. Development proposals of 50 units or more, or new non-residential development of 1000sqm or more, will need to provide an assessment of the provision of on-site decentralised energy (DE) networks and combined heat and power (CHP).*
- 3. Where feasible, new development of 50 units or more, or new non-residential development of 1000sqm or more, as well as schemes for the Proposal Sites identified in this Plan, will need to provide on-site DE and CHP; this is particularly necessary within the clusters identified for DE opportunities in the borough-wide Heat Mapping Study. Where on-site provision is not feasible, provision should be made for future connection to a local DE network should one become available.*

Applicants are required to consider the installation of low, or preferably ultra-low, NOx boilers to reduce the amount of NOx emitted in the borough.

Local opportunities to contribute towards decentralised energy supply from renewable and low-carbon technologies will be encouraged where appropriate.

Flood Risk and Drainage

4.69 **Policy LP21** ‘Flood Risk and Sustainable Drainage’ states that *“All developments should avoid, or minimise, contributing to all sources of flooding, including fluvial, tidal, surface water, groundwater and flooding from sewers, taking account of climate change and without increasing flood risk elsewhere.”*

4.70 Policy LP21 goes on to state with regard to sustainable drainage that *“the Council will require the use of Sustainable Drainage Systems (SuDS) in all development proposals. Applicants will have to demonstrate that their proposal complies with the following:*

1. A reduction in surface water discharge to greenfield run-off rates wherever feasible.

2. Where greenfield run-off rates are not feasible, this will need to be demonstrated by the applicant, and in such instances, the minimum requirement is to achieve at least a 50% attenuation of the site's surface water runoff at peak times based on the levels existing prior to the development.”

Transport

4.71 **Policy LP 44** ‘Sustainable Travel Choices’ outlines that the Council will seek to promote sustainable modes of transport and will:

“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, taking account of local character and context.

Walking and cycling

Ensure that 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.

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. Protect existing public transport interchange facilities unless suitable alternative facilities can be provided which ensure the maintenance of the existing public transport operations. Applications will need to include details setting out how such re-provision will be secured and provided in a timely manner.

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. Planning applications will need to be supported by the provision of a Transport Assessment if it is a major development, and a Transport Statement if it is a minor development.”

Policy LP 45 ‘Parking Standards and Servicing’ states that “*the Council will require new development to make provision for the accommodation of vehicles in order to provide for the needs of the development while minimising the impact of car-based travel including on the operation of the road network and local environment, and ensuring making the best use of land. It will achieve this by:*

- *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.*

Biodiversity

4.72 **Policy LP15** ‘Biodiversity’ states that new developments should seek to incorporate and create new habitats or biodiversity features into development sites where appropriate, and that for major developments, there is a requirement to deliver net gain for biodiversity, wherever possible.

4.73 **Policy LP16** ‘Trees, woodlands and landscape’ states the Council will require the protection of existing trees and ensure that proposed landscape design and materials are of high quality and compatible with the surrounding landscape and character.

4.74 **Policy LP17** ‘Green roofs and walls’ states that “*green roofs and/or brown 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 / brown roof.*”

Employment

4.75 **Policy LP 40** ‘Employment and local economy’ outlines that the Council will support a diverse and strong local economy through the creation of employment opportunities.

Waste

4.76 **Policy LP24** ‘Waste Management’ states that *“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, including conversions and changes of use 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 guidance and advice set out in 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. Development proposals in close proximity to the river should utilise the river for the transport of construction materials and waste where practicable.*
- 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.”*

Other Material Considerations

Draft London Plan

4.77 The Draft New London Plan sets out the proposed development strategy for London from 2019 to 2041. It was published by the Mayor for consultation between 1 December 2017 and 2 March 2018. On 13th August 2018 the Mayor published the ‘Draft New London Plan showing Minor Suggested Changes’. These suggested changes have been prepared following a review of consultation responses, and consist of clarifications, corrections and factual updates to the draft Plan that will help inform the Examination in Public that opened on 15 January 2019. The emerging new London Plan is now a material consideration in the determination of applications. The weight attributed to this document is a matter for the decision-maker. The closer the document is to adoption, the greater the weight that should be given to it.

4.78 The following draft policies are considered to be pertinent to this application:

Housing for Older People

- 4.79 **Draft Policy H1** ‘Increasing housing supply’ recognises the need to ensure that ten-year housing targets are achieved, through the encouragement of development on specific sites. The Policy advises that boroughs should pro-actively use brownfield sites to provide a good supply of housing.
- 4.80 **Draft Policy H14** ‘Supported and specialised accommodation’ recognises that the delivery, retention and refurbishment of supported and specialised housing which meets an identified need should be supported. The policy suggests that the form of specialised accommodation will vary, but should be designed to satisfy the requirements of the specific group it is intended for.
- 4.81 **Draft Policy H15** (Specialist older persons housing) recognises the need for sites suitable for development for specialist older persons housing. Residential nursing home (including end of life and dementia care home accommodation) is considered as C2 use.
- 4.82 **Paragraph 4.15.3A** makes clear that there is no requirement to provide affordable housing as part of care home accommodation development. The paragraph outlines that C2 care home accommodation is considered to include the following attributes:
- *“personal care and accommodation are provided together as a package with no clear separation between the two*
 - *the person using the service cannot choose to receive personal care from another provider*
 - *people using the service do not hold occupancy agreements such as tenancy agreements, licensing agreements, licences to occupy premises, or leasehold agreements or a freehold*
 - *likely CQC-regulated activity will be ‘accommodation for persons who require nursing or personal care’”*
- 4.83 **Table 4.4** outlines a need for Richmond to provide 155 specialist older persons housing units per year between 2017 and 2029
- 4.84 **Paragraph 4.15.9** goes on to outline that the estimated number of older people with dementia is forecast to rise from 73,825 in 2017 to 96,939 in 2029; an increase of 31%. The draft Plan states that a range of accommodation types will be required to meet this needs of those with dementia.
- 4.85 **Paragraph 4.15.10** states that residential nursing care accommodation (C2) is an important element of the suite of accommodation options for older Londoners and this should be recognised by boroughs and applicants. It states that to meet the predicted increase in demand for care home beds to 2029, London needs

Design

- 4.86 **Draft Policy D1** ‘London’s form and characteristics’ states that *“development plans, area-based strategies and development proposals should ensure the design of places addresses the following requirements:*

- *Form and layout*
- *Experience*
- *Quality and character.”*

4.87 **Draft Policy D2** ‘Delivering good design’ states that *“design and access statements submitted with development proposals should provide relevant information to demonstrate the proposal meets the design requirements of the London Plan.”*

4.88 **Draft Policy D3** ‘Inclusive design’ states that *“to deliver an inclusive environment and meet the needs of all Londoners, development proposals are required to achieve the highest standards of accessible and inclusive design, ensuring they:*

- 1) *can be entered, and used and exited safely, easily and with dignity by all;*
- 2) *are convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment;*
- 3) *are designed to incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.”*

4.89 **Draft Policy D3** also states that *“buildings should be designed and built to accommodate robust emergency evacuation procedures for all building users, including those who require level access. All building users should be able to evacuate from a building with dignity and by as independent means as possible.”*

Heritage

4.90 **Draft Policy HC1 ‘Heritage Conservation and Growth’** states that:

- *“Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.*
- *Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and*

landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.”

Air Quality

- 4.91 **Draft Policy SI1** ‘Improving air quality’ states that *“development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality. Particular care should be taken with developments that are in Air Quality Focus Areas or that are likely to be used by large numbers of people particularly vulnerable to poor air quality, such as children or older people.”*

Energy and Sustainability

- 4.92 **Draft Policy SI2** ‘Minimising greenhouse gas emissions’ states that *“major development should be net zero-carbon. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:*

- 1) *Be lean: use less energy and manage demand during operation*
- 2) *Be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly.*
- 3) *Be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on site*
- 4) *Be seen: monitor, verify and report on energy performance.*

- 4.93 A minimum on site reduction of at least 35% beyond Building regulations is required for major development.

Flood Risk and Sustainable Drainage

- 4.94 **Draft Policy SI12** ‘Flood risk management’ states that *“development proposals should ensure that flood risk is minimised and mitigated and that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses.”*

- 4.95 **Draft Policy SI13** ‘Sustainable drainage’ states that *“development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible in line with the following drainage hierarchy. There should also be a preference for green over grey features:*

- 1) *Rainwater use a resource (for example rainwater harvesting, blue roofs for irrigation)*
- 2) *Rainwater infiltration to ground at or close to source*

- 3) *Rainwater attenuation in green infrastructure features for gradual release (for example green roofs, rain gardens)*
- 4) *Rainwater discharge direct to a watercourse (unless not appropriate)*
- 5) *Controlled rainwater discharge to a surface water sewer or drain*
- 6) *Controlled rainwater discharge to a combined sewer.”*

Transport

4.96 **Draft Policy T1** ‘Strategic approach to transport’ states that “Development plans and development proposals should support and facilitate:

- 1) *“The delivery of the Mayor’s strategic target of 80% of all trips in London to be made by foot, cycle or public transport by 2041.*
- 2) *The proposed transport schemes set out in 10.1.”*

4.97 **Draft Policy T4** ‘Assessing and mitigating transport impacts’ states that “*development plans and proposals should reflect and be integrated with current and planned transport access, capacity and connectivity. Where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address any adverse transport impacts that are identified.*”

4.98 **Draft Policy T5** ‘Cycling’ states that “*development plans and proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. This will be achieved through:*

1. *Supporting the delivery of a London wide network of cycle routes, with new routes and improved infrastructure*
2. *Securing the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well located. Developments should provide cycle parking at least in accordance with the minimum standards set below.”*
 - *Long Stay - 1 space per 8 FTE staff + 1 space per 8 students*
 - *Short Stay - 1 space per 100 students”*

4.99 **Draft Policy T7** ‘Deliveries, servicing and construction’ states that “*developments should be designed and managed so that deliveries can be received outside of peak hours.*”

Noise

4.100 **Policy D13** ‘Noise’ states that *“in order to reduce, manage and mitigate noise to improve health and quality of life, residential and other non-aviation development proposals should manage noise by:*

- *avoiding significant adverse noise impacts on health and quality of life*
- *reflecting the Agent of Change principle as set out in Policy D12.*
- *mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses*
- *improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity*
- *separating new noise-sensitive development from major noise sources (such as road, rail, air transport and some types of industrial use) through the use of distance, screening, layout, orientation, uses and materials – in preference to sole reliance on sound insulation*
- *where it is not possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through applying good acoustic design principles*
- *promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.”*

Ecology

4.101 **Policy G6** ‘Biodiversity and access to nature’ states that *“developments should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information- and addressed from the start of the development process. Proposals which reduce deficiencies in access to nature should be considered positively”.*

Policy G7 ‘Trees and woodlands’ seeks to ensure trees are retained wherever possible.

Waste

4.102 **Draft Policy Sl8** ‘Waste capacity and net waste self-sufficiency’ states the following:

2. *“Promote a more circular economy that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible*
3. *Encourage waste minimisation and waste avoidance through the reuse of materials and using fewer resources in the production and distribution of produces*
4. *Ensure that there is zero biodegradable or recyclable waste to landfill by 2026*

5. *Meet or exceed the recycling targets for each of the following waste streams and generating low-carbon energy in London from suitable remaining waste*
 - a) *Municipal waste- 65% by 2030*
 - b) *Construction and demolition waste -95% by 2020*
6. *Designing developments with adequate and easily accessible storage space that supports the separate collection of dry recyclables and food.”*

Hampton Village Planning Guidance SPD (2017)

4.103 The SPD outlines the need to ensure that Hampton’s local character and conservation areas are respected and enhanced through new development. The SPD seeks to help promote high quality design within the village and ensure Hampton remains ‘a vibrant, caring community with facilities to meet local needs’. The site is identified within Character Area 4: Hampton Village Conservation Area.

4.104 The SPD (page 52) specifically refers to the application site and states that:

“Proposal: Appropriate land uses include business (B1), employment generating and other commercial or social and community infrastructure uses. The Building of Townscape Merit should be retained and a pedestrian link should be provided through the site.

Any development proposals would need to consider the following:

- *The conversion of the existing building duly respects its architectural character, particular in relation to its late Victorian features and retaining visual cues to its previous use as a Police Station.*
- *Respect the scale and massing of the existing building, the main retail frontage and the surrounding residential setting, of which the majority of buildings are two to three storeys.*
- *Ensure that new development respects and complements the street scene.*
- *Contemporary design elements may be appropriate where they complement the existing Victorian setting. Notable buildings to consider include the Police Station itself and the white rendered former Cinema located at 77 Station Road.”*

Buildings of Townscape Merit SPD (2015)

4.105 The SPD outlines the Council’s approach to Buildings of Townscape Merit and notes that:

- *“it is hoped that by drawing attention to the historic, architectural and townscape interest of such buildings and structures, owners and others will regard them more carefully when considering any proposals for alteration, extension or replacement. The removal of original or characteristic features, or*

the introduction of unsympathetic windows, doors or materials can not only destroy the visual quality of one building but erode the entire character and interest of an area. Many Buildings of Townscape Merit play a crucial role in the character of local areas. The sympathetic maintenance and adaptation of these buildings can preserve and indeed increase the attractiveness of an area.

- *It must always be borne in mind that these buildings and structures are not the same as listed buildings and that unless they are within a designated conservation area they enjoy no legal protection from demolition. There will always be a presumption against the demolition of Buildings of Townscape Merit. Consent for demolition will only be granted when the Council is assured that retention and adaptation is not possible and where the proposed replacement is consistent with other policies and exhibits a high standard of design that would complement the surrounding area. Indeed the Council will endeavour to protect the character and setting of all Buildings of Townscape Merit through negotiation of a sympathetic scheme, as far as possible treating proposals for works to or close to them as if they were listed buildings.”*

Development Control for Noise Generating and Noise Sensitive Development (2018)

4.106 The SPD outlines the role of the Council in assessing noise-generating and noise-sensitive development and states the technical guidance required to be followed for the appropriate acoustic assessment. The SPD outlined that for noise sensitive development the Council:

“will consider carefully in each case whether proposals for new noise sensitive development (including by a change of use) would be incompatible with existing activities. Such new noise sensitive development will not normally be permitted in areas which are, or are expected to become, subject to high levels of noise or an otherwise unacceptable acoustic environment. When determining planning applications for development which will be exposed to an existing noise source, the Borough will consider both the likely noise exposure at the time of the application and any change that may reasonably be expected in the foreseeable future e.g. from future intensification of transportation noise sources or future changes in commercial/industrial activities or positive regeneration effects. Where the application site is considered to be otherwise suitable then the principle requirement will be to secure and achieve appropriate acoustic standards through the application of good acoustic design.

There will be a general presumption against new noise sensitive development that is likely to experience significant adverse effects from noise unless it can be demonstrated that the economic and/or social and/or environmental benefits associated with the proposed development outweigh the adverse effects.”

Conservation Areas SPG (2002)

4.107 The SPG provides background and contextual information to the designation of a conservation area by LBRuT. The SPG confirms that the application site is located within the Hampton Village Conservation Area.

Planning Practice Guidance - Housing for older and disabled people (2019)

- 4.108 The Government published National Planning Practice Guidance on housing for older people in June 2019. The Guidance makes clear that offering older people a better choice of accommodation to suit their changing needs is vital to enable them to live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems.
- 4.109 The Guidance outlines that *“it is for the local planning authority to consider into which use class a particular development may fall. When determining whether a development for specialist housing for older people falls within C2 (Residential Institutions) or C3 (Dwellinghouse) of the Use Classes Order, consideration could, for example, be given to the level of care and scale of communal facilities provided.”*
- 4.110 The Guidance notes that it is important to ensure that a variety of housing need is provided by local authorities, from accessible and adaptable general needs housing to specialist housing with high levels of care and support to help the ageing population.

Richmond Housing and Homelessness Strategy (2018 – 2023)

- 4.111 The strategy aims to support opportunities which will improve the housing offer for older people, including those with care and support needs. The Strategy establishes that the Council will ensure that any new accommodation proposed for older people meets the evidential need in the Borough (as highlighted in the Retirement Housing Review, Extra Care Evidence Base, and Council’s planning policies).

Extra Care Housing Evidence Base (2015)

- 4.112 As set out in the Council’s Extra Care evidence base, there is a demand for affordable extra care accommodation. The evidence base identifies that many older people with care needs want to remain in their own home but would consider moving to an extra care scheme especially if it is near where they currently live and was well designed to meet their needs including, where appropriate, wheelchair access.
- 4.113 The evidence base also highlights that there is an identified need for ‘dementia friendly’ accommodation to support those with elderly mental illness. The Council state that with the number of people with dementia expected to increase appropriate accommodation pathways need to be in place.
- 4.114 The evidence base suggests that there is an estimated need for at least an additional 81 extra care units in the borough provided across two to three areas in the period 2015 to 2020.

Retirement Housing Review (2016)

- 4.115 The Retirement Housing Review conducted by LBRuT states that the demographic and health and wellbeing factors are likely to increase the need for extra care provision over the longer term in Richmond. The Review notes that the proportion of those aged 65 and over will have grown to 14.8% by 2020 with 30,800 projected to be in this group.

LBRuT Strategic Housing Market Assessment (2016)

4.116 The Council undertook a Strategic Housing Market Assessment to help inform the new Local Plan review. The Assessment makes specific reference to the need to provide appropriate accommodation for older persons:

“24. A growing older population is expected to exert a key influence on future demand. Approximately 34% growth in the population over 65 is expected in the SHLAA-constrained demographic scenario. Linked to a growing older population, the population with dementia is expected to increase by 58%- 68% and those with mobility problems by 46%-58%. It will be important to provide a range of housing options and support – including specialist housing, adaptations to properties and floating support.

25. In regard to specialist accommodation for older persons, a need for between 61-75 units per annum is identified. This forms part of the C3 need for housing. This would include provision of extra-care and sheltered accommodation. However, decisions about types of specialist housing that are required will need to be taken at a local level taking account of specific needs and existing supply.

26. In addition, the modelling indicates a need for 26-29 residential care bedspaces. The provision of additional extra care housing could reduce this requirement. This would fall within a C2 use, and is separate from the overall need for housing assessed herein.”

LBRuT Annual Monitoring Report (August 2017)

4.117 The Annual Monitoring Report ('AMR') for LBRuT was published in August 2017 and covers the 2016/2017 period. The Report outlines that LBRuT exceeded their housing delivery target of 315 homes per annum for 2016/2017 by delivering 460 homes. The AMR notes that only 6 homes were delivered within Hampton Ward. The AMR notes that LBRuT have a 5-year housing land supply.

5 The Case for Permission

5.1 This application is for full planning permission for the following description of development:

“Retention and refurbishment of the former police station building with part demolition of rear wings and ancillary buildings, and the construction of a three storey side and rear extension and basement to form a Class C2 registered care home comprising 22 care suites and 67 care bed units, with shared facilities, car and cycle parking, landscaping and ancillary works”

5.2 This section assesses the proposals against the relevant policies of the London Plan and LBRuT’s Local Plan (2018) to establish that the proposed development accords with the Development Plan and should be granted planning permission.

Land Use

5.3 The proposed C2 care home will provide accommodation for 94 persons, comprising 67 care beds and 22 care suites (with individual kitchens and dining areas).

Existing site use

5.4 The former Hampton Police Station which is understood to have been vacant since May 2014 is a sui generis use. The loss of the police station and construction of a three-storey (plus basement) residential development at the site has already been accepted in principle through planning permission 16/0606/FUL. The partial loss of the police station and the provision of a new building of a similar size to that previously granted under permission 16/0606/FUL is therefore considered acceptable in principle.

5.5 The use of the police station site for the proposed development will enable a vacant site to come back into use, provide significant public benefit through meeting an identified need within the Borough for care facilities, whilst providing local employment opportunities (as described below).

The C2 use class proposed

5.6 The accommodation proposed will meet all minimum CQC standards and would provide ‘personal care for people in need of such care by reason of old age’ as defined in Article 2 of the Town and Country Planning (Use Classes) Order 1987 (as amended) (“UCO”).

5.7 Part C of the UCO comprises:

- Class C1 hotels;
- Class C2 residential institutions;
- Class C2A secure residential institutions; and
- Class C3 dwellinghouses.

5.8 Within the UCO, Class C2 is defined as follows:

“C2 – Residential Institutions

Use of the provision of residential accommodation and care to people in need of care (other than the use within Class C3) (dwelling houses).

Use as hospital nursing home

Use as a residential school, college or training centre”.

5.9 The UCO defines “care” as:

“Personal care for people in need of such care for reasons of old age, disablement, past or present dependence on alcohol, drugs or past or present mental disorder, and Class C2 also includes the personal care of children and medical care and treatment”.

5.10 Therefore, it is clear from the above definitions that the provision of residential accommodation and care to people in need of care is within Class C2, which is distinct from a Class C3 dwellinghouse, whereby no significant care is provided.

5.11 As detailed in Sections 1 and 3, all residents within the care home will receive a basic level of care and have meals provided, with additional care tailored to meet individuals’ specific needs and requirements so as to deliver an integrated care and support environment for frail, elderly residents. Accordingly ‘care’ will comprise a key component of everyday life for all residents within the care home.

5.12 The 22 care suites will provide sleeping, toilet, personal washing and some cooking facilities to promote more independent ‘assisted’ living and so would contribute to meeting LBW’s intention to take “a flexible approach to adapt to changing needs” and ensuring that there is sufficient additional extra-care housing being developed within the borough. However, residents of these units would be cared for on a day-to-day basis by care home staff and would be able to use all facilities including communal dining and lounge areas.

5.13 All prospective residents must meet qualifying criteria. They will have a needs assessment to ensure that the qualifying criteria are met which will include:

- A minimum age restriction. The description of C2 uses in the UCO refers to the elderly but also includes care provided to people of all ages. Nevertheless, age occupancy restrictions are, unsurprisingly, common when demonstrating C2 uses as older people are more likely to have a need for care; and
- A need for some form of care. It is proposed that the care needs of occupiers is assessed at the point of entry. This process would establish whether residents are in need of care as required by the UCO definition of C2 use. This requirement to assess care needs could be secured either by a condition on the planning permission of a clause within the s106 legal agreement.

- 5.14 The extra-care offer within the care home is distinct from sheltered housing developments, which provide no care on site and minimal ordinary warden facilities or even just emergency pull cords within a development of (Class C3) self-contained units with their own front doors. The distinction between the accommodation within the proposed care home and sheltered housing accommodation is clear and material in planning terms.
- 5.15 Having regard to the level of care provided within the care home as set out above, it is clear that the development falls within Class C2 of the Use Classes Order, as has been established with the relevant Planning Authorities for all 6 existing Cinnamon Care Homes.

Site Allocation

- 5.16 As outlined in Section 4 of this Statement, the site is allocated under Local Plan Policy SA3 for *“appropriate land uses include business (B1), employment generating, and other commercial or social and community infrastructure uses. The Building of Townscape Merit should be retained and a pedestrian link should be provided through the site”*.
- 5.17 Supporting paragraphs also note that *“the evidence suggests that there is a need for employment generating and other commercial or social infrastructure uses in this area.”*
- 5.18 The proposed C2 use at the site will deliver a commercial infrastructure use to the site which will also be employment generating, creating approximately 44 jobs. The principle façade of the former police station building, a Building of Townscape Merit is also to be retained as part of the proposals. It is therefore considered that the proposed development is in accordance with Local Plan Policy SA3.
- 5.19 The proposed development will also help to contribute to the vitality and vibrancy of Hampton Village Centre, bringing an existing vacant brownfield site back into active use. The site will help contribute to the mixed-use nature of the Village Centre and is therefore considered to be in accordance with policies SA3 and LP25 of the Local Plan.

The housing needs case

- 5.20 The provision of 67 care beds and 22 care suites will meet an identified need for additional accommodation and provide housing choice for older people within LBRuT in accordance with Policy LP37 of the Local Plan.
- 5.21 This additional provision of accommodation will specifically contribute to meeting the need for approximately 61-75 units per year of specialist accommodation for older persons, as outlined within the Strategic Housing Market Assessment (2016).
- 5.22 The proposed C2 development will also help to meet the increased demand within LBRuT for care home accommodation, as outlined within the Extra Care Housing Evidence Base (2015). The proposed development will help to provide housing choice for older persons within LBRuT, where it is expected that

14.8% of the population of Richmond will be aged 65 and over by 2020, as noted in the Retirement Housing Review (2016).

- 5.23 In addition, a Needs Assessment prepared by Carterwood is provided as part of the application package. The Assessment outlines that there is a clear need both for the proposed care home and extra care facilities provided as part of the proposed development.
- 5.24 With regards to the former, the Assessment outlines that the need in the market catchment for care homes will increase significantly in the next 10 years to 2030 with the unmet need for care homes beds rising to over 500 beds in the next 3 years and to over 1,100 by 2030. For LBRuT specifically, it is predicted that unmet need for care home beds will rise to 450 beds in the next 3 years and to over 700 by 2030.
- 5.25 For the latter, the Assessment states that there is a significant need for private extra care units in the area with more than sufficient demand to support the proposals, by a considerable distance. The Assessment notes that *“it is one of the larger market shortfalls of private extra care/ enhances sheltered housing we have surveyed, driven by the large population base and relatively low level of provision”*.
- 5.26 Furthermore, although the proposal seeks the development of a (Class C2) care home on site and not (Class C3) residential accommodation, it will increase the supply of housing in the Borough. This is because the delivery of accommodation for up to 94 residents and will result in elderly occupants moving out of existing housing into more appropriate accommodation that better provides for their needs and requirements, thereby freeing up housing stock. Those moving into the care home are likely to be moving out of their own homes (typically within a few miles of the care home), which they are likely to have been under-occupying since their own family left home. These homes will then be released for sale on the open market and made available to new families. Notwithstanding this, as outlined above, the proposed development will help contribute to meeting housing targets for care home accommodation as outlined within the London Plan.
- 5.27 This principle is confirmed in the RTPI Good Practice Note No.8 which recognises that providing accommodation for older people *“frees up other sectors of the housing market e.g. release of family accommodation into local housing markets.”*
- 5.28 Overall, there would be a substantial, positive impact in increasing housing supply in the Borough and this would accord with Local Plan Policy LP37 which seeks to provide housing that meets the needs of all sections of the community.

Affordable housing requirement

- 5.29 Given that the proposed lawful use class is C2, there is no requirement for affordable housing provision within the development. This is also in accordance with Draft London Plan Policy H15, specifically paragraph 4.15.3A.

5.30 It is considered that in relation to land use the proposal accords with the relevant development plan policies and in particular policies LP30 and LP37 of the Local Plan.

Design

5.31 Overall a design-led approach has been adopted to utilise the existing site and provide a building that will increase the quality and quantity of care home accommodation within Richmond. The proposal would provide a high quality, sustainable design and layout that contributes positively to local spatial character and (as detailed below) would not harm the amenity of occupiers/users and nearby properties.

5.32 The height and scale of the proposed scheme has been designed to carefully reflect the character of the area and is similar in scale to the previously permitted residential scheme at the site (Application Reference: 16/0606/FUL). The scale of the permitted scheme was three storeys plus basement, and this proposed development is also three storeys plus basement.

5.33 A comparison table, showing the approved residential scheme and proposed development is outlined below for reference:

Approved Residential Scheme	Proposed C2 Development
3 storeys (+ basement car park)	3-storeys (+basement)
5070m ² total floorspace	5053 m ² total floorspace (GIA)
39 car parking spaces cycle spaces	14 car parking spaces 22 cycle spaces

5.34 The layout of the permitted and proposed scheme is also comparable, although given the nature of the C2 use, the internal courtyard proposed has been reconfigured. Moreover, the proposed development has been designed to reduce massing and built-form along the western and northern boundaries of the site, when compared to the permitted scheme.

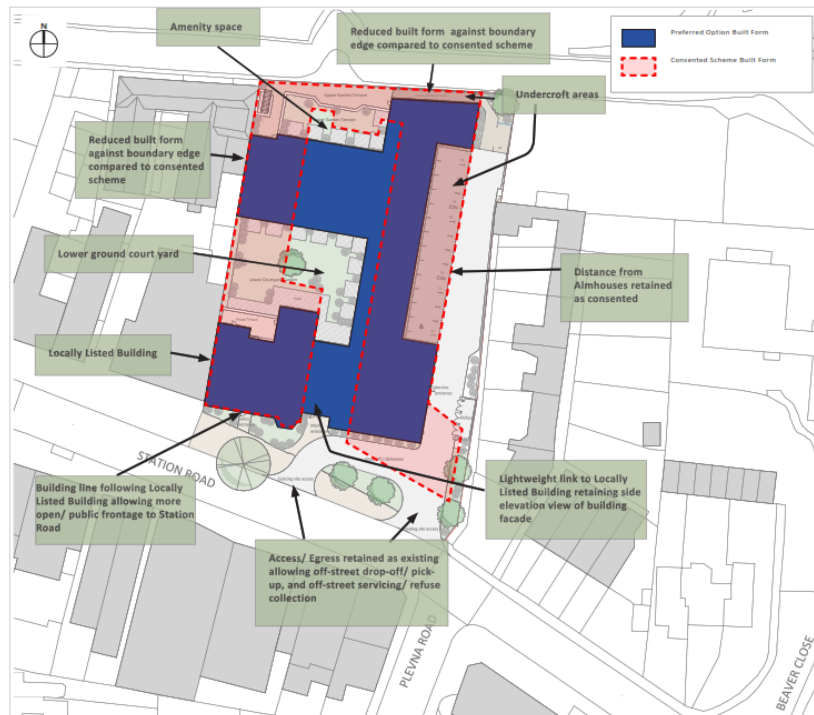


Figure 5.1: Comparison between the existing permitted residential scheme (application reference 16/0606/FUL) and proposed development. *Source: PRC Architecture.*

- 5.35 It is proposed that both the care beds and care suite elements will share one primary entrance as the care suites form an integral part of the building with shared communal spaces. It would not be possible for the care suites to operate independently of the remainder of the building.
- 5.36 In light of the above, it is considered that the proposal accords with all relevant Local Plan policies, in particular policies LP1 and LP2 of the Local Plan.

Amenity and Daylight/Sunlight

- 5.37 As part of securing good design for new developments, Policy LP8 of the Local Plan outlines that there should no harm caused to the amenity of occupiers/users and nearby properties through unacceptable noise, vibration, traffic congestion, air pollution, overshadowing, overbearing, unsatisfactory outlook, privacy or sunlight/daylight.
- 5.38 The proposed development has been designed to accommodate the needs of future residents, providing outlook and good levels of daylighting to all rooms and suites within the care home, with the walls and windows sufficient to prevent noise intrusion and the amenity space located away from the noise and air pollution generated by traffic on Station Road. All bedrooms and suites would exceed the national minimum space standards detailed in “Care Homes for Older People: National Minimum Standards 3rd edition (2003)” and applied under Section 23(1) of the Care Standards Act 2000.

- 5.39 The nature of the site and its context mean that the potential for direct impacts to neighbouring properties as a result of the proposal is limited. The site does however sit adjacent to a number of residential properties to the east (Queen's Bench Cottages). The impact of the proposed development on these properties has been carefully considered as part of the design process and it is considered that the proposed development will not adversely impact upon these properties.
- 5.40 As part of this amenity assessment daylight/sunlight report has been conducted by Hodkinson Consultancy in support of the application. The report outlines that in comparing the daylight results within those of the previous daylight/sunlight report submitted with the extant residential consent (16/0606/FUL) the proposed development's impact on surrounding properties is considered to be similar or moderately less than the impact of the extant consent.
- 5.41 In relation to sunlight/daylight, it is therefore considered that the impact of the current proposal is similar to the extant scheme, and complies with the Residential Development Standards SPD, which states that *"if no substantial loss of sunlight or daylight to adjoining dwellings and gardens occurs residential development will generally be acceptable"*, as well as Policy LP8 of the Local Plan, which states that *"good standards of daylight and sunlight [should] be achieved in new development."*
- 5.42 The proposals are therefore considered in accordance with relevant development plan policies that seek to protect amenity and in particular Policy LP8 of the Local Plan.

Heritage

- 5.43 A Heritage Statement has been prepared by The Built Heritage Consultancy. The proposed development has been carefully designed to ensure the retention of the most significant parts of the Police Station, which is a Building of Townscape Merit. This includes the front façade of the Police Station and the upper part of the east gable with its oeuil-de-boeuf window. Whilst the rear section of the Police Station is proposed to be demolished, this is considered to be less significant than the front section of the building and of lower architectural value.
- 5.44 The Statement outlines that Policy LP2 of the Local Plan would be satisfied through ensuring the height of the new build elements sits below that of the Building of Townscape Merit, and in line with other buildings within the conservation area at no higher than three storeys above ground.
- 5.45 The Statement makes clear that the proposed architecture, materials and style would fit with the wider conservation area, whilst the reinstatement of the Station Road frontage would be an enhancement. The proposed development is therefore considered to accord with Policy LP1 of the Local Plan.
- 5.46 Whilst, as outlined within the Statement, there would be some harm arising from the loss of the less significant rear parts of the Building of Townscape Merit, the proposed development would bring significant public benefits to the local area. Namely, the scheme enables a vacant building to be put back into active use, creates local employment opportunities and meets a significant need within the Borough for residential

care home accommodation (as outlined above). The proposed scheme will also lead to the reinstatement of a lost part of the street frontage in place of the existing boundary wall.

5.47 It is therefore considered that the proposals amount to ‘less than substantial harm’ to the non-designated heritage asset and that the public benefits brought forward by the proposals significantly outweigh any harm to the Building of Townscape Merit. The proposed development is therefore considered to accord with policies LP3 and LP4 of the Local Plan and NPPF paragraphs 196 and 197.

Transport

5.48 A Transport Assessment has been prepared by Paul Mew Associates in support of the planning application.

5.49 The need for 14 car parking and 22 cycle parking spaces has been calculated in accordance with the number of staff required for the care home and the expected number of visitors. The servicing requirements of the care home will also be suitably accommodated, as detailed below.

5.50 The Assessment outlines that the level of vehicle traffic predicted to arise from the proposal is expected to have a minimal and insignificant impact on the adjoining highway (Station Road) and will likely fall within daily/weekly fluctuations in vehicle trips on Station Road. The Assessment also outlined that the vehicle trip generation for the scheme is predicted to be less than the previously permitted residential scheme (Application Reference 16/0606/FUL). The Assessment also confirmed that the proposals accord with relevant site access guidance and that the provision of car parking and cycle parking is in accordance with the Council’s parking standards. With regards to deliveries and servicing, the Assessment also outlines that all servicing arrangements under the proposals are considered acceptable.

5.51 Cinnamon Care Collection is also committed to adopting a Travel Plan to encourage staff and visitors to walk, cycle, use public transport and car share, with a member of staff designated as the Travel Plan Co-ordinator to ensure it is implemented effectively. It is content for this to be secured via an obligation within the s106 legal agreement.

5.52 Please refer to the Travel Plan by Paul Mew Associates submitted in support of the application.

5.53 The proposals are therefore considered to be in accordance with relevant development plan policy and in particular, policies LP44 and LP45 of the Local Plan.

Flood Risk and Drainage

5.54 A Flood Risk Assessment and Foul Sewerage Statement has been prepared by CWA in support of this planning application. The Assessment confirms that the site is located within Flood Zone 1 (low risk) and the proposed development is classified as a ‘Less Vulnerable’ usage. It is confirmed that the proposals do not pose any increased flood risk to the site itself or adjacent developments.

- 5.55 Thames Water have confirmed that the existing foul sewer network does have sufficient capacity to accommodate the proposed use. The Assessment therefore outlines that foul water will be pumped via public sewer connection, subject to a formal s106 connection application. Surface water discharge is proposed to be attenuated on site via a cellular attenuation storage tank system.
- 5.56 It is considered that the proposals accord with all relevant development plan policies and in particular, policies LP11 and LP21 of the Local Plan.

Energy and Suitability

- 5.57 An Energy Strategy Report has been prepared by Harniss Consulting in support of the application. The report confirms that the CO₂ emissions and reductions associated with each stage of the energy hierarchy and energy demand reduction according to Part L 2013 is reached. The development proposes the use of a CHP unit and Solar PV which will meet the energy hierarchy and deliver a 35% carbon reduction. Therefore this is compliant with Local Plan policies LP20 and LP22.
- 5.58 Further information regarding the provision of utilities is provided in the Utilities Statement prepared by Harniss Consulting in support of the application.

BREEAM

- 5.59 The Energy Strategy prepared by Ingleton Wood sets out the detailed assessment on how the development can achieve the 'Excellent' BREEAM rating. BREEAM is the Building Research Establishments (BRE) measurement rating tool for green buildings. The proposed new building is to be designed and built to the highest sustainability standards and has aimed to meet the excellent rating required by Local Plan Policy LP22. The Strategy notes that the proposed development achieves a preliminary score of 72.54%, equivalent to the 'excellent' rating and all minimum requirements have been achieved. The proposals are therefore considered to be in accordance with Local Plan Policy LP22.

Ecology

- 5.60 A preliminary ecological appraisal has been prepared by Middlemarch Environmental in support of the application. The appraisal confirms that the habitats on the site are not deemed to be notable as they do not provide any unique resources that the surrounding area off site cannot also provide. The appraisal confirms that the potential impacts from the proposed development are considered negligible, but that recommendations, which are listed within the appraisal, should be undertaken to minimise any potential impact going forward.
- 5.61 A preliminary bat roost assessment has been prepared by Middlemarch Environmental in support of the application. The assessment outlines that the former Police Station building, and rear garages provide high potential to support roosting bats, whilst the small building to the south-east of the site (referred to as Building 3 within the assessment) and surrounding trees have low potential for roosting bats. In line with

relevant guidance, the assessment recommends that dusk/dawn emergence surveys are conducted at the site to determine the presence or absence of roosting bats within the structures on the site.

- 5.62 The proposed development will accord with the relevant development plan policies and in particular policies LP15 and LP16 of the Local Plan.

Noise

- 5.63 A noise assessment has been prepared by Noise Solutions Limited in support of this application. The report states that bedrooms on elevations other than Station Road and lounge areas should achieve acceptable internal noise levels with standard openable thermal double glazing and trickle ventilation. A slightly enhanced specification should achieve acceptable internal noise levels to bedrooms on Station Road. The Assessment notes that given the screening provided by the building from adjacent roads, external sound levels will meet relevant guidance. The Assessment confirms that the proposed development will accord with the relevant development plan policies and in particular Policy LP10 of the Local Plan.

Air Quality

- 5.64 An Air Quality Assessment has been prepared by REC in support of the planning application. The report outlines that with appropriate mitigation, the air quality impacts during the construction phase are considered to be acceptable for a development of this size and nature. Dispersion modelling at the site also confirmed that pollutant levels across the site were below the standards at all locations across the development and as such did not exceed the air quality objectives. There was found to be no significant effect on local air quality as a result of trips generated by the development. The Assessment does outline that the proposed development is above the GLA Air Quality Neutral benchmarks for building emissions and that appropriate mitigation has therefore been put in place.
- 5.65 It is considered that the proposed development accords with the relevant policies of the development plan, in particular Policy LP10 of the Local Plan.

Waste

- 5.66 As confirmed within the Design and Access Statement, the refuse and recycling store will be located adjacent to the access to the rear parking area. The existing western access, fronting Station Road, will be used for waste collections. This is considered to be in accordance with the relevant development plan policies and in particular, Policy LP24 of the Local Plan.

Construction

- 5.67 A Construction Management Statement (CMS) has been prepared by Paul Mew Associates in support of the planning application. The CMP outlined that the current construction programme is expected to run for approximately 24 months, subject to tender and contract negotiations. Measures are outlined within the draft

CMS to help control the emission of noise, vibration and dust during the proposals construction as well as measures to control traffic movements and deliveries to the site. As part of the CMS a coordinator will be formally appointed who will take responsibility for the day-to-day management of the CMS and will ensure those actions outlined within the CMS are followed correctly. It is considered that the above is in accordance with Policy LP10 of the Local Plan.

6 Conclusion

- 6.1 The proposed development will bring the existing, vacant (sui generis) brownfield site at 60-68 Station Road back into active use.
- 6.2 The proposed development will meet a clear identified need within the London Borough of Richmond upon Thames for new accommodation for older persons, meeting Local Plan, London Plan and National planning policies.
- 6.3 The proposed development has been designed to integrate within the existing townscape without giving rise to any adverse amenity, heritage or highway impacts. The proposed development has also been carefully considered in the context of the previously permitted scheme at the site (Application Reference 16/0606/FUL). The proposals will also create approximately 44 jobs and contribute to the vitality and viability of the mixed-use Hampton Village area within which the site lies.
- 6.4 The proposed development is considered to comply with the Development Plan as per Section 38(6) of the Planning and Compulsory Purchase Act 2004. In line with paragraph 11 of the NPPF, the proposals should therefore be considered as sustainable development for which planning permission should be granted without delay.
- 6.5 It is therefore considered that planning permission should be granted for the proposed development.

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