



Planning Statement

# *1 St James' Road, Hampton Hill TW12 1DH*

**On behalf of Hampton Hick Ltd: Proposed Full Planning Application for Demolition of existing building and the erection of a residential building, with associated works including landscaping and parking.**



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## Executive Summary

This Planning Statement is submitted in support of a planning application for the demolition of the existing building on site and the erection of a residential building with associated works. This planning application is prepared by the Jones Lang LaSalle (“JLL”, “we”, “us”, “our”) Planning Team on behalf of Hampton Hick Ltd (the “Client”, the “Applicant”). The site is under the jurisdiction of London Borough of Richmond upon Thames Council (hereinafter referred to as “LBRuT”; the “LPA”).

The application site area is 0.084 ha and is occupied by a two-storey dwelling surrounded by a large garden. The site sits on the intersection of Uxbridge Road, St James’ Road, Windmill Road and the Longford River. The site is close to the centre of Hampton Hill, with the local centres of Hampton and Teddington nearby. Hampton Hill High Street is a thriving local centre with good shopping and social amenities.

Transport connections are provided by Hampton, Fulwell and Teddington mainline rail stations, all serving London Waterloo. Local bus routes include the 285 - which serves the site - and the R68 and R70, which both travel along Hampton Hill High Street. The site has relatively easy access to the A316, which offers connections into London and out to the M3 and the South West. Local recreation facilities include the Holly Road Recreation ground within 500m. Carlisle Park and Bushy Park are also nearby. The open-air Hampton Pool is just over 1km away.

The proposed increase in residential units on this underdeveloped site will have no material adverse impact on local amenity. Flatted development is a common feature of St James’ Road and in the surrounding area and the proposed development can be easily accommodated on this plot. The lawful use of the site is Class C3.

The design of the proposals ensures there will be no increase in flood risk to the site and surrounding area. The transport and highways implications have been appraised- it is considered that the existing road network has capacity for any vehicle movements that result from the additional residential units on site. The proposals have also been assessed in respect to energy, trees, landscape and ecology and there are no adverse impacts arising in respect of these issues.

It is therefore, considered that the proposed development accords with the relevant adopted planning policies and associated guidance at the local, regional and national level and we would respectfully request that planning permission should be granted.

# 1 Introduction

1.1 This Planning Statement has been prepared by the Jones Lang LaSalle (“JLL”, “us”, “we”, “our”) Planning Team on behalf of Hampton Hick Ltd (the “Client”, the “Applicant”) to support an application for full planning permission at 1 St James’ Road, Hampton Hill, TW12 1DH (hereinafter referred to as the “site”).

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

*“Demolition of existing building and the erection of a replacement building to contain 9no. flats (Use Class C3), with associated works including landscaping and parking”.*

1.3 This report provides an assessment of the proposed development against the provisions of the Statutory Development Plan, National Planning Policy and other material considerations.

## Format of Submission

1.4 This application is formed and supported by the following technical documents; the table below identifies the documents and authorship:

**Table 1: Supporting Documents**

Document	Author
Application form for Full Planning Permission	JLL
Certificates of Ownership and Agricultural Holdings	JLL
CIL Form	JLL
Site Location Plan at 1:1250	WandD
Other application Drawings as listed on the submitted Covering Letter (various scales)	WandD
Design, Access, Landscape and Heritage Statement (DAS)	WandD/Huskisson Brown Associates/Maggie Gatland (MRICS) of Inland Management Ltd
Planning Statement	JLL

Transport Statement	Pulsar Transport Planning
Construction Management and Logistics Statement	Pulsar Transport Planning
Arboricultural Survey, Protection Plan, Method Statement and Impact Assessment	Arbtech
Preliminary Ecological Appraisal	Arbtech
Energy Report (including Sustainable Construction Checklist)	Base Energy
The London Sustainable Drainage Proforma	Base Energy
Statement of Community Involvement	Thornccliffe
Desk Study, Site Investigation & Risk Assessment Report	Southern Testing Consultancy
Surface Water and SuDS Assessment	Base Energy
Viability Assessment (under a separate cover)	Andrew Golland Associates

## **Structure of the Report**

1.5 The Statement is set out as follows;

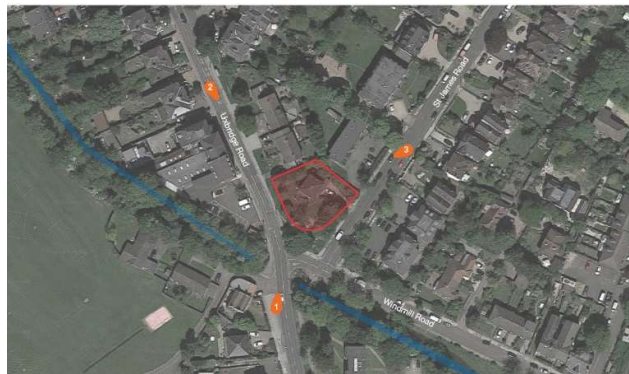
- Chapter 2 provides a description of the site and surrounding area;
- Chapter 3 provides an overview of the proposed development;
- Chapter 4 sets out the relevant planning policies against which the proposed development is assessed;
- Chapter 5 sets out the pre-application consultation;
- Chapter 6 sets out the case for planning permission;
- Chapter 7 discusses the planning balance; and
- Chapter 8 provides an overall conclusion.

## 2 The Site and Surroundings

- 2.1 The following section provides an overview of the site together with its immediate and wider context. A more detailed description is provided within the Design and Access Statement which is submitted as part of the application.

### Site Description

- 2.2 The application site comprises 1 St James' Road, a corner residential property located on a large plot of land at the junction between St. James' Road on the eastern side, Windmill Road on the southern side and Uxbridge Road on the southern side in Hampton Hill Village.
- 2.3 The site is not located in a Conservation Area; however, Longford River to the south of Windmill Road is bounded by the Joanna Southcote Chapel Conservation Area and land designated as Metropolitan Open Land (MOL) outside the site. The Boundary is set back from the public footpath with a grass buffer to the east, west and south of the site. The Longford River runs south of the site. The existing building is of 1960s style and a single-family dwelling, is not designated as a Building of Townscape Merit (BTM). No buildings on or adjacent to the site are locally or statutorily listed.
- 2.4 The site is close to the centre of Hampton Hill, with the local centres of Hampton and Teddington nearby. Hampton Hill High Street is a thriving local centre with good shopping and social amenities.
- 2.5 The red line application site area measures approximately 0.084ha.



*Figure 1: Aerial image of site*

- 2.6 The site has a PTAL rating of 1b. Transport connections are provided by Hampton, Fulwell and Teddington mainline rail stations, all serving London Waterloo. Local bus routes include the 285 – which serves the site – and the R68 and R70, which both travel along Hampton High Street. The site has easy access to the A316, which offers connections into London and out to the M3 and the South West.

- 2.7 Local recreation facilities include the Holly Road Recreation ground within 500m. Carlisle Park and Bushy Park are also nearby. Local schools include Carlisle Infant School, Hampton Hill Junior School and Hampton High School as well as Lady Eleanor Holles and Hampton School.
- 2.8 The wider area is characterised by buildings of different forms, scales and architectural styles and there are noticeable gaps between buildings. The Grade II Listed St. James Church lies roughly 250m to the north of the site.

### **Planning Policy Designations**

- 2.9 The LBRuT Proposals Map reflects the Borough's adopted development plan; London Plan (2016) and the Local Plan (adopted 2018). The site has no specific land use designations or allocations.
- 2.10 Surrounding allocations include an area of Metropolitan Open Land is located to the south-east. This allocation is not considered of specific relevance to the subject proposals.



## 3 The Proposed Development

- 3.1 The following section outlines the details of the development proposal. As noted in Section 1 of this Statement, the formal description of the proposed development relating to this application for full planning permission to the LBRuT is:

*“Demolition of existing building and the erection of a replacement building to contain 9no. flats (Use Class C3), with associated works including landscaping and parking”.*

- 3.2 The scheme has been designed in consultation with stakeholders and following pre-application discussions with LBRuT. Full details of the design evolution and rationale are included within the Design and Access Statement.

### Proposed Residential Mix

- 3.3 The proposal involves the clearance of the site and construction of a new residential building comprising 9no. flats (all market). The site has an area of 0.08ha, such that the proposed density equates to 338 hrh or 113 dph. The proposed residential mix reflects the likely demographic of future occupiers given the site’s suburban location.
- 3.4 The building will provide a total of 891m<sup>2</sup> of residential (Use Class C3) floorspace over 3 storeys. Table 2 below identifies the accommodation mix proposed:

**Table 2: Proposed Residential Mix**

Level	1B2P (57M <sup>2</sup> )	2B4P (77M <sup>2</sup> ; 82M <sup>2</sup> ; 83M <sup>2</sup> ; 86M <sup>2</sup> ; 88M <sup>2</sup> ; 89M <sup>2</sup> )	3B6P (116M <sup>2</sup> )
Ground	1	3 (77M <sup>2</sup> ; 82M <sup>2</sup> ; 88M <sup>2</sup> )	0
First	0	3 (83M <sup>2</sup> ; 86M <sup>2</sup> ; 89M <sup>2</sup> )	0
Second	0	1 (88M <sup>2</sup> )	1
Total	1	7	1
%	11.1	77.7	11.1

3.5 All units will comply with the Nationally Described Space Standards which are set out below:

**Table 3: Nationally Described Space Standards**

Number of bedrooms(b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) *			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0
	8p	125	132	138	

3.6 The proposed development aims to provide both good quality new homes in a sustainable part of the Borough but also aims to enhance the townscape character of this part of St James's Road by fully utilising this underdeveloped prominent corner plot, recreating the street frontage.

#### **Siting, Scale and Massing**

3.7 The proposed development will comprise a single building rising to a maximum of 3 storeys. The building steps down to a single storey toward the adjacent building at 130 Uxbridge Road, leaving a gap of 1m to the boundary. The building steps up in height on the southern side, in line with other residential buildings in the local area.

3.8 The proposed scale and massing are a product of proactive engagement with LBRuT at pre-application stage and the articulation of the facades has been carefully considered to ensure it sits comfortably within its existing context.

3.9 The pre-application response provided by LBRuT confirmed that the proposed siting, scale and massing is supported - it states at Page 7:

*"(...) It is therefore recommended that overall the proposal is well designed and responds well to the corner site. The bulk, massing and scale is appropriate insofar as it would define the corner whilst retaining a degree of openness". (Pre-Application Ref. 19/P0316/PREAPP)*

## **Design**

- 3.10 The application is supported by a Design, Access, Landscape and Heritage Statement, which sets out the rationale for the proposed scheme and details the design features and materials proposed.
- 3.11 The design response to the scheme proposed, respects the character of the immediate properties and the wider area. The site is located just outside the Joanna Southcote Conservation Area, in a wider area of high-quality Victorian and Edwardian buildings. Detailed research was conducted by Wandd Architects into the Hampton Hill vernacular - materials, character and detailing. Elements that are described both within this planning submission and the Hampton Hill Village Supplementary Planning Guidance document. The intent driving the design is that it should slot deferentially but confidently into the area, whilst avoiding pastiche by interpreting the local vernacular in an imaginative and contemporary way. The ambition is for the building to continue the Hampton Hill tradition of richly-detailed and high-quality residential buildings.

## **Access, Servicing and Parking**

- 3.12 The single entrance to the development is via St James's Road. This provides clear passage to the courtyard/car park area. The proposal revises the existing parking layout, formalising the existing ad-hoc arrangement, providing a total of 5 car parking spaces for the 9 flats on site. A dedicated refuse and recycling store are proposed to the north of the parking area. Access and adequate turning space for refuse and service vehicles is provided. The scheme provides, 18 cycle parking spaces within a secure covered cycle store located to the west of the building.
- 3.13 The proposal for the floor finish of the courtyard/car park area is a natural stone, which will allow appropriate drainage (see SuDS report). In keeping with local context this choice of material will give a 'front garden' feel to the courtyard, similar to other St James' Road front gardens and driveways. This new courtyard entrance will provide level access from the pavement into the courtyard without any dropped kerbs or level changes. The threshold into the building will be level with the courtyard and all ground floor units will have thresholds and floor levels equal to the entrance lobby. The upper floors are accessed either via a staircase, or a lift, which is large enough to allow a wheelchair turning circle therefore providing disabled access to all floors. All public areas, private circulation spaces and corridors are of appropriate dimensions to allow wheelchair access. The proposal includes a ground floor flat (Unit 4) that conforms to all disabled access requirements as part of Approved Document Part M, including a disabled parking space in the courtyard.

## **Landscaping**

- 3.14 The landscape strategy has largely been informed by the need to retain existing trees on site and a tree survey is submitted with this application. The layout also seeks to avoid placing accommodation on root protection areas.

- 3.15 This proposal includes extensive landscaping plans (see Landscaping Strategy submitted with the application) in order to site the building within an ‘arcadian’ environment, a description of the local area contained within the document Hampton Hill Village Planning Guidance. All windows at first-floor level have large planter-style window boxes that will provide a ring of flora and fauna all around the building visible to passers-by from all sides. In addition, all amenity spaces/balconies/loggies have room for extensive planting. The lobby-cover ledge will be covered in a wildflower sedum, which will be visible from St James Road. All these highly-considered elements aim to render the building with an arcadian character, in keeping with the local area. The boundary treatment will further enhance the arcadian setting with creeper planted fencing. An Arboricultural Impact Assessment and Arboricultural Method Statement is also submitted with the application assesses the landscaping plans in detail.

### **Ecology**

- 3.16 The existing site comprises few nature conservation features. As part of the development, it is proposed to enhance the overall nature potential by using native species within the landscaping wherever possible, through the introduction of an extensive sedum roof and the use of bird and bat boxes. All existing features the may be of ecological value, such as good quality mature trees and easing hedgerow shall be retained.

### **Amenity Space**

- 3.17 Each proposed unit will be provided with generous amenity space in the form of private gardens or balconies. The amenity space provided is considered generous for a residential building containing 9no. flats which typically do not include private gardens.
- 3.18 The area is also well served by public open space, with Bushy Park, the second largest park in London, located a 10-minute walk south of the site.

### **Refuse and Recycling Storage**

- 3.19 Refuse and recycling storage will be provided in a communal store located to the north of the parking area in accordance with LBRuT’s Refuse and Recycling Storage Requirements SPD. The SPD requires storage capacity of 240 litres for refuse per household of three bedrooms or fewer. The recycling storage requirement is detailed below in Table 4.

**Table 4: Recycling Storage Requirements**

<b>Number of households served by bin area</b>	<b>Mixed paper, card and carton recycling bins</b>	<b>Mixed container recycling bins</b>	<b>Total recycling bins</b>
<b>3 to 5</b>	1x 240L	1x 240L	<b>2x 240L</b>
<b>7 to 8</b>	1x 360L	1x 360L	<b>2x 360L</b>
<b>9 to 11</b>	2x 240L	2x 240L	<b>4x 240L</b>
<b>12 to 17</b>	2x 360L	2x 360L	<b>4x 360L</b>
<b>18 to 25</b>	1x 1100L	1x 1100L	<b>2x 1100L</b>
<b>26 to 45</b>	2x 1100L	2x 1100L	<b>4x 1100L</b>
<b>46 to 70</b>	3x 1100L	3x 1100L	<b>6x 1100L</b>

3.20 The development proposes 9no. residential units, thereby generating a need to accommodate 4 X 240 L recycling bins which the scheme provides. The scheme also provides a compliant level of refuse storage split between 1 x 1100 L and 1 x 240 L units.

### **Energy and Sustainability**

3.21 The development is designed as being low carbon using sustainable energy sources in accordance with Local and London Plan requirements.

3.22 Energy efficient design proposals have been made which would secure an estimated 6% reduction in CO2 over Building Regulation Part L1A 2013 requirements. These include improved insulation, limiting air permeability and thermal bridging, and incorporating efficient heating, lighting and controls. Solar PV has been assessed as a feasible technology to further reduce CO2 emissions through on-site generation to achieve an overall 36% reduction.

3.23 The proposals have been influenced by and assessed using LBRuT's Sustainable Construction Checklist to demonstrate how the development aims to achieve targets for carbon dioxide emissions reduction. The proposals achieve a score of 41 which equates to a rating of B, meaning that the development will help to significantly improve the Borough's stock of sustainable developments.

3.24 Full details of the energy strategy can be found within the accompanying Energy and Sustainability Statement.

## 4 Relevant Planning Policy

### Introduction

- 4.1 This section provides an overview of national, regional and local policies and other material considerations against which the planning application will be assessed.
- 4.2 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that applications for development must be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 4.3 The National Planning Policy Framework (NPPF) (first published March 2012 and last updated June 2019) sets out the Government's planning policy, alongside Planning Practice Guidance (PPG) and written ministerial statements.
- 4.4 The relevant adopted Development Plan for this site comprises:
- The LBRuT Local Plan, adopted July 2018; and
  - The London Plan 2016 (consolidated with alterations since 2011).
- 4.5 LBRuT is under a legal duty to have regard to all material considerations. These include: The Government's National Planning Policy Framework (NPPF) (2019); National Planning Practice Guidance (NPPG) and; the requirements of relevant Circulars. The London Plan is being revised the, following the Secretary of State's Directions, can be afforded weight in the decision-making process.
- 4.6 Whilst not part of the adopted development plan, other material considerations which should be taken into account include LBRuT's Supplementary Planning Documents (SPD) - in particular Design Quality (adopted February 2006), Development Control for Noise Generating and Noise Sensitive Development (adopted September 2018), Refuse and Recycling Storage Requirements (adopted April 2015), Sustainable Construction Checklist (adopted January 2016).

### The London Plan

- 4.7 The London Plan is the overall strategic plan for London. 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 should be in general conformity with the London Plan and its policies guide decisions on planning applications by Councils and the Mayor.

- 4.8 Chapter 3 of the London Plan is the key consideration for this proposal at the regional level. The Plan identifies a need for 315 additional dwellings per year within the Borough. Policy 3.3 seeks to increase housing supply and states that Boroughs should seek additional development capacity through intensification, town centre renewal and mixed-use redevelopment.
- 4.9 Policy 3.4 seeks to optimise housing potential, especially in accessible areas with good public transport links. The supporting paragraphs to this policy state that the form of housing output should be determined primarily by an assessment of housing requirements and not by assumptions as to the built form of the development. While there is usually scope to provide a mix of dwelling types in different locations, higher density provision for smaller households should be focused on areas with good public transport accessibility (measured by Public Transport Accessibility Levels [PTALs]), and lower density development is generally most appropriate for family housing. Where transport assessments other than PTALs can reasonably demonstrate that a site has either good existing or planned public transport connectivity and capacity, and subject to the wider concerns of this policy, the density of a scheme may be at the higher end of the appropriate density range. Where connectivity and capacity are limited, density should be at the lower end of the appropriate range.
- 4.10 Policy 3.5 requires that housing developments are of a high quality and should protect and enhance London's residential environment. Policy 3.8 requires a range of different homes that Londoners can afford.
- 4.11 Policy 5.2 (Minimising Carbon Dioxide Emissions) states that development proposals should make the fullest contribution to minimising carbon dioxide emission in accordance with the 'be lean, be clean, be green' energy hierarchy. It seeks for a reduction in carbon emissions to meet building regulations requirements for new non-domestic development from 2016 – 2019 and for residential buildings to be zero carbon. The policy also requires developments to achieve the highest standards of sustainable design and construction in order to mitigate against climate change. Further, all new major residential development (10 units or more) should achieve zero carbon standards in line with London Plan policy. A zero-carbon home is one where at least 35% of regulated CO<sub>2</sub> emissions reductions are achieved on-site, with the remaining emissions (up to 100%) to be offset through a contribution into the Council's Carbon Offset Fund. Where development viability is a concern, affordable housing will be prioritised over zero carbon contributions.

### Richmond Local Plan (2018)

- 4.12 Richmond’s Local Plan was adopted on 3 July 2018 replacing the Core Strategy and Development Management Plan. The Plan sets out policies and guidance for development within the Borough until 2033. Those policies which we consider pertinent to the proposed development are set out below.
- 4.13 Policy LP 1 ‘Local Character and Design Quality’ requires all development to be of a high architectural and urban design standard. Proposals should demonstrate a thorough understanding of the site and how it relates to its existing context. The following will be considerations when assessing proposals:
1. *“compatibility with local character including the relationship to existing townscape, development patterns, views, local grain and frontages as well as scale, height, massing, density, landscaping, proportions, form, materials and detailing;*
  2. *sustainable design and construction, including adaptability, subject to aesthetic considerations;*
  3. *layout, siting and access, including making best use of land;*
  4. *space between buildings, relationship of heights to widths and relationship to the public realm, heritage assets and natural features;*
  5. *inclusive design, connectivity, permeability (as such gated developments will not be permitted), natural surveillance and orientation; and*
  6. *suitability and compatibility of uses, taking account of any potential adverse impacts of the collocation of uses through the layout, design and management of the site.”*
- 4.14 Policy LP 2 ‘Building Heights’ requires new buildings to respect and strengthen the setting of the borough’s valued townscapes and landscapes, through appropriate building heights, by the following means:
1. *“require buildings to make a positive contribution towards the local character, townscape and skyline, generally reflecting the prevailing building heights within the vicinity; proposals that are taller than the surrounding townscape have to be of high architectural design quality and standards, deliver public realm benefits and have a wholly positive impact on the character and quality of the area;*
  2. *preserve and enhance the borough's heritage assets, their significance and their setting;*
  3. *respect the local context, and where possible enhance the character of an area, through appropriate:*
    - a. *Scale*



- b. Height*
  - c. Mass*
  - d. urban pattern*
  - e. development grain*
  - f. Materials*
  - g. Streetscape*
  - h. Roofscape and*
  - i. wider townscape and landscape;*
- 4. take account of climatic effects, including overshadowing, diversion of wind speeds, heat island and glare;*
  - 5. refrain from using height to express and create local landmarks; and*
  - 6. require full planning applications for any building that exceeds the prevailing building height within the wider context and setting.”*

4.15 Policy LP 8 ‘Amenity and Living Conditions’ requires development 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.”*

- 4.16 Policy LP 10 ‘Local Environmental Impacts, Pollution and Land Contamination’ seeks to ensure that the environmental impacts of developments do not cause detrimental effects on the health, safety and amenity of existing and new users or occupiers of the development site or surrounding land. This includes air pollution, noise and vibration, light pollution, odours and fumes, solar glare and solar dazzle and land contamination.
- 4.17 Policy LP 15 ‘Biodiversity’ seeks to protect and enhance the borough’s biodiversity and in particular, sites designated for their biodiversity and nature conservation value. Where development would impact on species or habitats, potential harm should:
1. *“firstly, be avoided (the applicant has to demonstrate that there is no alternative site with less harmful impacts),*
  2. *secondly be adequately mitigated; or*
  3. *as a last resort, appropriately compensated for.”*
- 4.18 Policy LP 16 ‘Trees, Woodlands and Landscape’ requires “the protection of existing trees and provision of new trees, shrubs and other vegetation of landscape significance that complement existing, or create new, high quality green areas, which delivery amenity and biodiversity benefits.”
- 4.19 Policy LP 17 ‘Green Roofs and Walls’ aims for the incorporation of green roofs and/or brown roofs into “new major developments with roof plate areas of 100sqm or more where technically feasible and subject to considerations of visual impact.” At least 70% of any potential roof plate should be used as a green/brown roof. It is the responsibility of the applicant to provide evidence and justification if a green roof cannot be incorporated. The Council will expect a green wall if a green/brown roof is not feasible.
- 4.20 Policy LP 20 ‘Climate Change Adaption’ promotes and encourages 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; and*
  6. *active cooling systems (ensuring they are the lowest carbon options).”*

- 4.21 Policy LP 21 '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."
- 4.22 Policy LP 22 'Sustainable Design and Construction' requires that developments achieve the highest standards of sustainable design and construction to mitigate the likely effects of climate change.

- 4.23 Policy LP 23 ‘Water Resources and Infrastructure’ states that “the borough’s water resources and supplies will be protected by resisting development proposals that would pose an unacceptable threat to the borough’s rivers, surface water and groundwater quantity and quality.”
- 4.24 Policy LP 24 ‘Waste Management’ requires 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.
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.”*
- 4.25 Policy LP 35 ‘Housing Mix and Standards’ states that “development should generally provide family sized accommodation, except within the five main centres and Areas of Mixed Use where a higher proportion of small units would be appropriate. The housing mix should be appropriate to the site-specifics of the location. All new housing development, including conversions, are required to comply with the Nationally Described Space Standard”
- 4.26 All new housing development, including conversions, should provide adequate external space. Purpose built, well designed and positioned balconies or terraces are encouraged where new residential units are on upper floors, if they comply with policy LP 8 Amenity and Living Conditions. Regard should be had to the Council’s Residential Development Standards SPD as appropriate. Amenity space for all new dwellings, including conversions, should be:
- a. private, usable, functional and safe;*
  - b. easily accessible from living areas;*

*c. orientated to take account of need for sunlight and shading;*

*d. of a sufficient size to meet the needs of the likely number of occupiers; and*

*e. accommodation likely to be occupied by families with young children should have direct and easy access to adequate private amenity space. 90% of all new build housing is required to meet Building Regulation Requirement M4 (2) 'accessible and adaptable dwellings' and 10% of all new build housing is required to meet Building Regulation Requirement M4 (3) 'wheelchair user dwellings'.*

- 4.27 Policy LP 36 'Affordable Housing' requires 50% of all housing units to be affordable comprising a tenure mix of 40% for rent and 10% intermediate housing. "Where a reduction to an affordable housing contribution is sought on economic viability grounds, developers should provide a development appraisal to demonstrate that schemes are maximising affordable housing. The developer will be required to underwrite the costs of a Council commissioned economic viability assessment.
- 4.28 Policy LP 38 'Loss of Housing' states that existing houses should be retained. At point 'C' it states that redevelopment of existing housing should normally only take place where:
- a. "a. it has first been demonstrated that the existing housing is incapable of improvement or conversion to a satisfactory standard to provide an equivalent scheme; and, if this is the case*
  - b. the proposal does not have an adverse impact on local character; and*
  - c. the proposal provides a reasonable standard of accommodation, including accessible design, as set out in LP 35 Housing Mix and Standards".*

- 4.29 Policy LP 44 ‘Sustainable Travel Choices’ aims to “promote safe, sustainable and accessible transport solutions, which minimise the impacts of development including in relation to congestion, air pollution and carbon dioxide emissions, and maximise opportunities including for health benefits and providing access to services, facilities and employment.”
- 4.30 Policy LP 45 ‘Parking Standards and Servicing’ requires “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”.

### **National Planning Policy Framework (NPPF)**

- 4.31 The NPPF (2019) replaced the Planning Policy Guidance Notes (PPG) and Planning Policy Statements (PPS) documents. The NPPF is considered fundamental to Government Reforms to promote economic growth and make the planning system more accessible. The NPPF sets out the Government’s overarching economic, environmental and social planning policies in England and how these are expected to be applied.
- 4.32 The NPPF introduces a presumption in favour of sustainable development. Paragraph 11 requires Local Authorities to provide for objectively assessed needs for housing and with regard to decision taking on planning applications, development proposals that accord with an up-to-date development plan should be approved without delay. Planning permission should be granted without delay where proposals accord with the development plan.
- 4.33 Paragraph 59 requires a sufficient amount and variety of land to come forward where it is needed to significantly boost the supply of homes. Paragraph 60 requires that strategic policies are informed by a local housing need assessment.
- 4.34 Paragraph 68 places an importance on small and medium sized sites as they can make an important contribution to meeting the housing requirement of an area. Local Authorities should identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare.
- 4.35 Paragraph 80 places significant weight on the need to support economic growth and productivity.
- 4.36 Paragraph 91 promotes social interaction through mixed use developments and street layouts that allow for easy pedestrian and cycle connections. Paragraph 92 seeks the provision of community facilities, including social, recreational and cultural facilities. Section 9 promotes sustainable transport, with Paragraph 103 directing development towards accessible areas and Paragraph 104 supports an appropriate mix of uses on site.
- 4.37 Paragraph 108 requires that appropriate opportunities to promote sustainable transport have been taken up and that any impacts on the transport network have been mitigated.

- 4.38 Paragraph 109 states that development should only be refused on highways grounds if there would be an unacceptable impact on highway safety or impacts on the road network would be severe. Paragraph 110 prioritises pedestrian, cycle and public transport movements ahead of the private car.
- 4.39 Paragraph 117 seeks the effective use of land in meeting the needs for new homes. As much use as possible should be made of brownfield land. This is further emphasised in paragraph 118, which gives substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs. It also supports the development of underutilised land and buildings.
- 4.40 Paragraph 123 seeks to avoid homes being built at low densities and encourages development to make optimal use of each site.
- 4.41 Section 12 aims to achieve well-designed places with Paragraph 124 stating that good design is a key aspect of sustainable development.
- 4.42 Paragraph 127 requires development that will add to the overall quality of the area, is visually attractive as a result of good architecture, layout and landscaping, is sympathetic to local character, establishes a strong sense of place and optimises the potential of the site.
- 4.43 Paragraph 131 states that great weight should be given to outstanding or innovative design which helps raise the standard of design in the area and promotes high levels of sustainability.
- 4.44 Paragraph 189 requires a consideration of heritage assets and their settings, with Paragraph 192 stating that Local Authorities should take account of the positive contribution that the conservation of heritage assets can make to sustainable communities, and the desirability of new development making a positive contribution to local character and distinctiveness.

#### **Intend to Publish London Plan (2019)**

- 4.45 The GLA are currently in the process of preparing a new London Plan. A letter from the Secretary of State for Housing (“SOS”) was issued to the Mayor of London on 13 March 2020 which exercises the powers of the SoS to direct changes to the London Plan. Consequently, the Mayor cannot publish the London Plan until he has incorporated the Directions provided by the SoS. These Directions are significant and seek to boost housing delivery in the Capital.
- 4.46 The Draft London Plan is currently a material consideration in planning decisions. However, in light of the letter from the SoS, it is considered that the draft plan can no longer be given significant weight, and a more appropriate approach would be to attribute some weight to the draft policies, until such time as the SoS is satisfied with the Plan.
- 4.47 The key policies within the Draft Plan are set out below.
- 4.48 Policy GG2 seeks to create successful, sustainable mixed-use places that make the best use of land. Sites which are well connected by existing or planned public transport should be prioritised.

- 4.49 Policy GG4 seeks to create a housing market that works better for all Londoners. Those involved in planning and development must ensure that more homes are delivered, support the delivery of 50 percent affordable housing and provide good quality homes that meet high standards of design.
- 4.50 Policy D4 requires housing development to be of high-quality design with adequately sized rooms and comfortable and functional layouts. A minimum of 5 sqm of private outdoor space should be provided for 1-2 person dwellings where there are no higher local standards in the borough development plan documents, and an extra 1 sqm for each additional occupant.
- 4.51 Policy D5 requires at least 10 percent of dwellings to meet Building Regulation requirement M4(3) ‘wheelchair user dwellings.’
- 4.52 Policy H1 sets out the ten-year targets for net housing completions. The target for LBRuT is the provision of 8,110 new dwellings over the plan period.
- 4.53 Policy H2 states that boroughs should proactively support well-design new homes on small sites (below 0.25 hectares in size). The ten-year target for housing on small sites in LBRuT is 6,340 new dwellings over the plan period.
- 4.54 Policy H5 sets a strategic target of 50 percent of all new homes to be genuinely affordable. Policy H7 sets out the following split of affordable products to be applied to residential development:
- A minimum of 30 percent low cost rented homes
  - A minimum of 30 percent intermediate products
  - The remaining 40 percent to be determined by the borough.
- 4.55 Policy H12 requires schemes to provide a range of unit sizes. A higher proportion of one and two bed units are generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity. T
- 4.56 Policy SI2 (Minimising greenhouse gas emissions) stipulates that in meeting the zero-carbon target a minimum on-site reduction of at least 35% beyond Building Regulations is expected. Residential development should aim to achieve 10 per cent. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on site, any shortfall should be provided through a payment in lieu contribution or off-site provided that an alternative proposal is identified, and delivery is certain.

### **New Local Plan**

- 4.57 LBRuT is currently undertaking the preparation of a New Local Plan to replace the current Local Plan and Twickenham Area Action Plan. A consultation on the Direction of Travel recently took place. This is the first stage in the engagement process with residents, business and other stakeholders on what the vision for growth and future development should be. Following consultation, there will be further engagement



opportunities to inform and shape the new Local Plan later in 2020, however, official dates are yet to be confirmed.

### **Hampton Hill Village Planning Guidance**

- 4.58 The Hampton Hill Village Planning Guidance (VPG) was adopted in June 2017 as a Supplementary Planning Document and comprises part of the Local Plan. It provides additional information to expand on and assist in understanding policies in the Local Plan and is therefore relevant where it relates to the proposals in this application.
  
- 4.59 The VPG defines several character areas within Hampton Hill, for each of which it sets out an assessment based on properties having largely similar features and materials. The site lies at the interface of Character Area 1: Burtons Road; Character Area 5: Uxbridge Road South and Park Place; and Character Area 6: the extended Joanna Southcott Chapel Conservation Area.

## 5 Pre-Application Consultation

### Pre-Application Consultation

- 5.1 The Applicant has undertaken two pre-Application consultations with officers at LBRuT. Details of discussions with officers and the amendments made to the proposals as a result, are referred to in this Statement and in the Design and Access Statement that accompanies this application.
- 5.2 The first pre-application consultation commenced with LBRuT in January 2019. A formal pre-application meeting was held at the Council's offices on 21<sup>st</sup> February 2019 and subsequently the LPA's written pre-application response was issued on 4<sup>th</sup> June 2019 (Ref. TP/DC/19/P0035/PREAPP).
- 5.3 The second pre-application consultation commenced with the LPA in October 2019 (19/P0035/PREAPP). A formal pre-application meeting was held at the Council's offices on 13<sup>th</sup> December 2020 and subsequently amended drawings were issued to the LPA on 21<sup>st</sup> January 2020 and 31<sup>st</sup> January 2020.
- 5.4 The LPA's written pre-application response was issued on 21<sup>st</sup> February 2020. The response detailed the acceptability of the principle of the scheme, subject to detailed design matters.
- 5.5 The applicant has responded proactively to the LPA's advice and the following alterations to the scheme are brought forward.
  - The layout of Unit 2 and Unit 5 have been altered in order to improve the quality of one of the bedrooms in each unit by providing superior daylight ingress and ventilation.
  - A change in paving material has been added between the access driveway and the building to give pedestrians a clear passage of movement towards the front entrance.
  - A dedicated parking space has been provided, as close as possible to the building entrance
  - A sedum green roof has been added to the flat roof on the north side of the building at 1<sup>st</sup> Floor level. In addition, another sedum green roof has been added to the larger roof at 2<sup>nd</sup> floor level. A sedum covering has been applied to the entrance lobby cover, visible from St James Road.
  - Details of the bin store are contained within the planning proposal.

### **Community Consultation**

- 5.6 The scheme proposals were also subject to stakeholder and public consultation which is summarised in the Statement of Community Involvement (SCI), prepared by specialist community consultation group 'Your Shout', part of Thorncliffe, which is submitted as part of the application documents. The comments made in this process were input to the design team and where appropriate are reflected in the application and Design and Access Statement.

## 6 The Case for Planning Permission

6.1 The following issues are key to the application and are considered in turn below:

- Land Use and Principle of Development
- Loss of Existing Dwelling
- Infill and Backland Development
- Density
- Housing Mix
- Design, layout, Metropolitan Open Land and Heritage
- Residential Amenities of Neighbouring Occupiers
- Amenity Space Provision
- Energy and Sustainability
- Transport, Highways and Parking
- Ecology and Arboriculture
- Land Contamination
- Surface Water and Sustainable Urban Drainage Systems
- Refuse and Recycling
- Community Infrastructure Levy (CIL)
- Community Engagement

6.2 The Planning Statement now considers each of these points in turn:

### Land Use and Principle of Development

- 6.3 The site has an established C3 residential use (Use Classes Order, 1987, as amended). The site is occupied by a single dwelling. In relation to the uplift in the amount of housing on the site, **Paragraph 59** of the NPPF calls on local authorities to “support the Government’s objective of significantly boosting the supply of homes”. The NPPF also encourages making effective use of land and explains (**Paragraph 68**) that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly.
- 6.4 **Paragraph 11** of the NPPF explain that decision should apply a presumption in favour of sustainable development and should, as a minimum, provide for objectively assessed needs for housing, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.
- 6.5 Redevelopment of Site to increase the number of residential units is therefore in line with the objectives of the NPPF.

- 6.6 At a regional level, **Policy 3.3** (Increasing Housing Supply) of the London Plan seeks to significantly boost the supply of residential development and states that housing growth should be prioritised on brownfield sites.
- 6.7 **Policy 8.4** (Monitoring and Review) of the London Plan states that the London Plan will be kept under review using several Key Performance Indicators. Key Performance Indicator 1 states that policies in the London Plan “should maximise the proportion of development taking place on previously developed land.” The London Plan target for this is for at least 96% of new residential development to be on previously developed land
- 6.8 Locally, Local Plan **Policy LP 34** (New Housing) requires that in ‘Teddington and the Hamptons’ approximately 650-700 dwellings will need to be delivered. The policy acknowledges that delivery requirements will eventually be replaced by the revised London Plan Target and that LBRuT aims to exceed the current requirements.
- 6.9 The redevelopment of the Site also provides an opportunity to assist the Council to meet its strategic objectives in delivering housing in the borough.
- 6.10 The London Plan (2016) sets an annual target of 315 homes per annum for LBRUT. Paragraph 3.19 of the London Plan states that Boroughs should use their housing supply targets as minimum and calls on local authorities to exceed their housing targets.
- 6.11 As previously stated, the Draft London Plan is at an advanced stage and therefore its policies hold weight. The Plan increases the annual target to 811 homes per annum. We are also aware that the recent Inspector’s response to the London Plan issued in October 2019 suggested a revision to the housing targets for London boroughs. For Richmond, the revised target is 410 new dwellings per annum. This is an increase on the current figure of 315 new homes per annum and provides further justification for intensification of suitable brownfield sites.

### **Loss of Existing Dwelling**

- 6.12 Local Plan **Policy LP 38** (Loss of Housing) is addressed in the LBRuT’s pre-application response (Ref. 19/P0035/PREAPP). However, given the existing dwelling is of no architectural merit and occupies a substantial and underdeveloped plot, it is considered that the benefits of introducing and uplift in residential units far exceed the benefit of retaining a single dwelling. Point ‘C’ of the policy states:

*“Redevelopment of existing housing should normally only take place where:*

- a. it has first been demonstrated that the existing housing is incapable of improvement or conversion to a satisfactory standard to provide an equivalent scheme; and, if this is the case*
- b. the proposal does not have an adverse impact on local character; and*

*c. the proposal provides a reasonable standard of accommodation, including accessible design, as set out in LP 35 Housing Mix and Standards”.*

- 6.13 Dealing with each point in turn, with regard to point ‘a’, it is not considered that that house can be improved substantially within its current layout. The building is a 1960s building which cannot be converted to nine flats. In terms of improvements, the scale of the required additional development would require substantial works including significant strengthening of the existing foundations. Furthermore, any additional development would not allow for individual amenity space. Therefore, the building cannot be retained in its current form and for the development to be provided. As such, the removal of the existing building is justified.
- 6.14 With regard to point ‘b’, the redevelopment of the site will not have an adverse impact on local character. This is addressed both in this statement and the Design, Access, Heritage and Landscaping Assessment. Indeed, it is our view that the redevelopment would enhance the character and setting of the site and provide a more appropriate design solution within the wider locality.
- 6.15 With regard to point ‘c’, the existing site contains a single two-storey dwelling with garage constructed in the 1960’s. The building is of no architectural value and does not meet modern standards of energy performance or accessible design. The small dwelling sits within a large site, which is underdeveloped in comparison to local density. The proposed development will provide all new flats with space meeting national space standards. All units will be dual aspect and will be provided with amenity space.
- 6.16 Therefore, the proposal complies with Local Plan policy LP38. In addition, whilst it is recognised that the retention of buildings should be supported, there is a clear imperative to ensure that brownfield sites are developed to their optimal state. It is our view that national and regional policies support brownfield development and replacement of existing development with development of greater density.

### **Density**

- 6.17 Part of the approach to sustainable development advocated by the NPPF is to make the best use of available development land, especially brownfield sites, in order to boost significantly the supply of housing. **Paragraph 122** of the NPPF states that planning policies and decisions should support development that makes efficient use of land as well as create and sustain an appropriate mix of uses. Plans should contain policies to optimise the use of land and meet as much of the identified need for housing as possible.
- 6.18 High density development is needed to accommodate the projected population growth in the Borough as identified in the adopted and emerging London Plan.

- 6.19 Draft London Plan **Policy D6** (Optimising Housing Density) seeks for development proposals to make the most efficient use of land and optimise density, including developing densities above those of the surrounding area on most sites. This reflects a step change approach to the current London Plan.
- 6.20 **Local Plan Policy LP34** (New Housing) states that the approximately 650-700 dwellings should be delivered in Teddington and the Hamptons.
- 6.21 **Paragraph 9.1.7** of the Local Plan states that *“Proposals should optimise the potential of sites”* and that *“the majority of housing delivery in the borough is expected to be on previously developed land”*.
- 6.22 The proposal is to provide 9no. residential units on a 0.08 ha site, which equates to approximately 338 habitable rooms per hectare and 113 dwellings per hectare. The proposed density exceeds that set out in the adopted London Plan’s density matrix; however, the current London Plan states that the matrix should not be applied mechanistically. It is considered that the current Plan does not provide clear guidance on suitable densities, given that although the Site has a low PTAL score, it is demonstrated in the submitted Transport Assessment, that the Site is in fact highly accessible and therefore the proposed density is entirely appropriate.
- 6.23 As demonstrated in this Statement, the scheme provides numerous material benefits that weigh in favour of the proposed density. Considering London’s and LBRuT’s pressing and urgent need for housing, optimising the density of all new development is a strategic matter for London, the draft London Plan explicitly recognises that the appropriate density of a site is an output of a process of assessment, rather than an input. The appropriate density of the application Site has been arrived at through a design-led approach, taking account of the site context and infrastructure capacity. The applicant acknowledges **Paragraph 122** of the NPPF (2019) that requires planning policies and planning decisions to support development that makes efficient use of land, taking into account a range of contextual factors. Therefore, the proposals are consistent with this requirement.
- 6.24 In addition, a higher density of housing on this Site is considered acceptable, given, as assessed in this Statement, the proposed density is not considered to cause any adverse impacts on neighbouring amenity or the character and appearance of the area.
- 6.25 In summary, we conclude that the proposed density of the scheme is acceptable.

### **Housing Mix**

- 6.26 **Paragraph 124** of the NPPF states that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. 5.50
- 6.27 **Policy 3.8** (Housing Choice) of the London Plan states that new developments should offer a range of housing choices in terms of the mix of housing sizes and types. 5.51
- 6.28 **Policy LP 35** (Housing Mix and Standards) states:

- Development should generally provide family sized accommodation except within the five main centres and Areas of Mixed Use where a higher proportion of small units would be appropriate. The housing mix should be appropriate to the site-specifics of the location.;
- All new housing development, including conversions, are required to comply with the Nationally Described Space Standard; and
- New housing development should provide adequate external space, included balconies or terraces for upper floor units (in accordance with Policy LP 8).

6.29 The policy also states that 90% of all new build housing is required to meet Building Regulation Requirement M4 (2) ‘accessible and adaptable dwellings’ and 10% of all new build housing is required to meet Building Regulation Requirement M4 (3) ‘wheelchair user dwellings’. The proposals fully accord with this requirement.

6.30 Supporting paragraph 9.2.1 states that new development should provide family sized accommodation. The text also explains that there is an increasing proportion of one person households and on appropriate sites an element of small units (1 bedroom or studios) will also be required.

6.31 **Policy LP 37** (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.

6.32 Table 2 set out again here sets out the proposed indicative unit mix by tenure as a percentage.

Level	1B2P (57M <sup>2</sup> )	2B4P (77M <sup>2</sup> ; 82M <sup>2</sup> ; 83M <sup>2</sup> ; 86M <sup>2</sup> ; 88M <sup>2</sup> ; 89M <sup>2</sup> )	3B6P (116M <sup>2</sup> )
Ground	1	3 (77M <sup>2</sup> ; 82M <sup>2</sup> ; 88M <sup>2</sup> )	0
First	0	3 (83M <sup>2</sup> ; 86M <sup>2</sup> ; 89M <sup>2</sup> )	0
Second	0	1 (88M <sup>2</sup> )	1
Total	1	7	1
%	11.1	77.7	11.1



- 6.33 In our view, the scheme provides a balanced mix of smaller units and family sized market units which both assist the borough in meeting its housing targets across all tenures. In terms of policy compliance, Policy LP 35 states that to accord with the policy the appropriate mix should be considered on a site by site basis having regard to its location, the existing stock in the locality and the character of an area and take account of existing infrastructure capacity such as schools and transport. It is considered that the proposed mix fully accords with the prevailing local character which consists of a wide-variety of housing types. In addition, the local area is well served by schools (6 primary and 2 secondary) and transport links
- 6.34 The Council's pre-application response also stated at Page 10, paragraph 2 that the proposal is considered compliant with Policy LP 35.

### **Design, Layout, Metropolitan Open Land and Heritage**

- 6.35 The application is supported by a Design, Access, Heritage and Landscaping Assessment (DAHLA), which sets out the rationale for the proposed scheme and details the design features and materials proposed. The Design and Access Statement also includes within it a Heritage Statement prepared by Maggie Gatland (MRICS) of Inland Management Ltd.
- 6.36 The proposed design and layout, as set out in the accompanying Design and Access Statement, have adopted a form that reflects the location of the site and its relationship with the surrounding built form. The proposals have had regard to **Policy LP 2** in relation to building heights and are based on an assessment of prevailing character, which in this case spans the taller, larger footprints of the buildings fronting Uxbridge Road and the smaller scale residential properties located on St James's Road.
- 6.37 The site's context is, in large part, determined by its location on a corner plot. The application proposals will help address the void in the St James's Road frontage that is formed by the current site and the scheme generally maintains the established building line.
- 6.38 The DAS states that the proposed high-quality materials and detailing incorporates and reflects those found on existing dwellings in the area. These materials are reinterpreted to provide a contemporary building that reflects the character of the local vernacular.
- 6.39 In terms of heritage, the Design and Access Statement concludes that the proposal for new residential development in this application would provide appropriate accommodation in an attractive building with associated landscaping thoughtfully designed to sit harmoniously within its surrounding context, making positive use of its corner site. Whilst being in the setting of some heritage assets it would not cause any harm to the significance of those assets.
- 6.40 Overall the revised proposal comprising this application would comply with relevant Development Plan policies relating to the historic environment and accord with the relevant historic environment policies of the NPPF and other appropriate guidance and advice identified in Section 3 above.

### **Residential Amenity of Neighbouring Properties.**

- 6.41 At all policy levels there is a requirement to prevent unacceptable harm to amenity arising from new development.
- 6.42 **Paragraph 123** of the NPPF emphasises the importance of optimising the potential of each site stating that authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight.
- 6.43 **Paragraph 127** also further requires development to provide a high standard of amenity for existing and future occupiers.
- 6.44 London Plan **Policy 7.6** states that buildings and structures should not *“cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate”*.
- 6.45 **Policy LP8** (Amenity and Living Conditions) requires all development to protect the amenity and living conditions for occupants of new and adjoining/neighbouring properties.
- 6.46 The ‘Residential Development Standards’ SPD states that alterations to residential buildings can make more effective use of urban land for modern living needs and well-considered alterations to dwellings which complement the appearance of a property can often increase their value. However, changes can harm the amenity of neighbouring occupiers through increased noise, disturbance and activity due to an intensification of use.
- 6.47 The ‘Small and Medium Housing Sites’ SPD mentions that in defining a layout, it is important that new developments do not infringe on the privacy, daylight and sunlight of adjacent properties nor that of the intended occupiers. Privacy, daylight and sunlight standards should be used as a check to ensure that a layout is acceptable but should not necessarily dictate the layout. To ensure that the privacy of occupiers is respected, the windows of main facing habitable rooms should preferably be no less than 20m apart. Where principal windows face a wall that contains no windows or those that are occluded
- 6.48 The layout of the scheme has been designed in consideration of amenity to neighbouring residents. The stepped approach of the building footprint has been informed by the positioning and orientation of such neighbouring buildings to the Site and has been incorporated to ensure that any harm is minimised.

### **Amenity Space Provision**

- 6.49 The Mayor’s Housing SPG sets out a requirement for a minimum of 5 sq m of private outdoor space that should be provided for 1-2 dwellings and an additional 1 sq m for each additional occupant (**Standard 4.10.1**).

- 6.50 Each of the proposed 9no. units will be provided with high-quality amenity space have been provided, most far exceed the Mayor of London's Housing SPG standards and LBRuT's Residential Development Standards. The detail of the amenity units is included within the Design and Access Statement.
- 6.51 The area is also well served by public open space, with Bushy Park, the second largest park in London, located a 10-minute walk south of the site.

### **Energy and Sustainability**

- 6.52 The NPPF (2019) seeks to increase the use and supply of renewable and low carbon energy and heat in order to address Climate Change and achieve environmental sustainability through improving biodiversity and minimising waste.
- 6.53 An Energy Statement has been provided by Integration which follows the Mayor's 'Be Lean, Be Clean, Be Green' methodology.
- 6.54 'Be Lean' refers to passive measures in the building fabric which can reduce energy use such as the walls, windows, doors and other building components. In terms of the proposals, the building fabric has been specified to meet or exceed the minimum fabric parameters outlined in Part L A of the Building Regulations 2013, as set out within the Energy Statement and are shown to achieve a 6.35% betterment in CO2 emissions compared to the Regulations.
- 6.55 'Be Clean' refers to the potential to connect to any local decentralized heating (DH) networks. The closest existing or potential heat networks are located away from the proposal site and therefore connection to third party heat networks is not viable for the development. However, an efficient central system has been proposed however which could connect to a more efficient heat network should one arise in the future.
- 6.56 'Be Green' refers to the provision of renewable and low carbon technologies. In terms of the 'Be Green' measures to be incorporated within the development, Solar PV has been assessed as a feasible technology to further reduce CO2 emissions through on-site generation to achieve an overall 36% reduction, which fully accords with local policy which requires a reduction of 35%.
- 6.57 The proposals have been influenced by and assessed using LBRuT's Sustainable Construction Checklist to demonstrate how the development aims to achieve targets for carbon dioxide emissions reduction. The proposals achieve a score of 41 which equates to a rating of B, meaning that the development will help to significantly improve the Borough's stock of sustainable development.
- 6.58 The scheme incorporates a green sedum roof with PV panels to satisfy the **Policy LP17**.
- 6.59 It is therefore, considered to be both sustainable and policy compliant and a low carbon development.

## Transport, Highways and Parking

- 6.60 **Policy LP45** 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
- 6.61 The application proposal is accompanied by a Transport Assessment, Parking Survey and Construction Logistics Plan. The TA assesses the proposals impact upon highways, sustainable transport modes and address issues of access in line with Paragraph 111 of the NPPF.
- 6.62 In terms of sustainability, the TA states that whilst the PTAL rating of the site is low, PTAL is only one measure of accessibility, and given that the site is close to bus services that provide onward connection to underground and rail stations, residents would be able to access a wide range of destinations using public transport. It concludes that, due to the site's proximity to transport links and services by walking or cycling the site is considered to be situated in a very accessible location and further information is provided later in this report which details the transport infrastructure proposed for the site.
- 6.63 As part of the assessment, parking surveys were undertaken on 3 and 4 of July 2019, and Sunday 5 April 2020 in line with LBRuT's parking survey methodology. The surveys demonstrated that overnight (i.e. when parking demand in this residential area would be at its highest), there was ample spare parking capacity. It can reasonably be concluded that should the proposed development result in overspill parking, this can be comfortably accommodated on-street.
- 6.64 A trip generation assessment was also undertaken, which shows that the impact of the proposed development is expected to generate a very low level of trips during peak periods and throughout the day. The site is expected to have a minimal impact on the public highway network and from a transport perspective meets the tests of the NPPF namely to ensure: opportunities for sustainable transport modes have been taken up; safe and suitable access to the site can be achieved by all people; that where necessary, improvements can be undertaken within the transport network that cost-effectively limit the significant impacts of the development. The impact of the development is not severe.
- 6.65 The submission is also supported by a Construction Logistic Plan. The overall objectives of the CLP are to:
- Lower emissions;
  - Enhance safety - Improved vehicle and road user safety; and
  - Reduce congestion - Reduced trips overall, especially in peak periods.
- 6.66 The CLP is prepared in accordance with the Transport for London (TfL) *Construction Logistics Plan*

*Guidance for Developers* and provides: a review of existing transport conditions at the site and surrounding area; a construction programme and methodology; details of vehicle routing and site access; measures to reduce of impact of construction on the highway network; and, a description of the implementation and monitoring of the CLP and an overview of how the CLP will be coordinated and communicated to the authorities, staff and subcontractors

- 6.67 In conclusion, and based on the above, the proposed development is considered to be fully compliant on transport grounds. The cumulative residual transport impacts of the proposal would be minimal. Therefore, the proposals would comply with the relevant national and local policy.

### **Ecology and Arboriculture**

- 6.68 The NPPF at **Paragraph 175** sets out how Local Planning Authorities should aim to conserve and enhance biodiversity in developments.
- 6.69 **Policy 7.19** (Biodiversity and Access to Nature) of the London Plan identifies that the Mayor will work with all relevant partners to ensure a proactive approach to the protection, enhancement, creation, promotion and management of biodiversity in support of the Mayor's Biodiversity Strategy.
- 6.70 Development proposals should, wherever possible, make a positive contribution to the protection, enhancement and management of biodiversity.
- 6.71 Local Plan **Policy LP 15** (Biodiversity) explains that the Council will protect and enhance the borough's biodiversity, in particular, but not exclusively, the sites designated for their biodiversity and nature conservation value, including the connectivity between habitats.
- 6.72 The application is supported by a Preliminary Ecological Appraisal prepared by Arbtech. The report describes the baseline ecological conditions of the site and evaluates habitats and describes the suitability of those habitats for notable or protected species. The Appraisal sets out its recommendations for further surveys and for ecological enhancements to be incorporated as part of the proposals.
- 6.73 The application is also supported by an Arboricultural Method Statement (AMS), Arboricultural Impact Assessment (AIA) and Tree Protection Plan (TPP), which includes a full survey of all trees within, and in the immediate vicinity of the site. The report follows precisely the strategy for Arboricultural appraisal intended to provide local planning authorities with evidence that trees have been properly considered throughout the development process. It is the conclusion of the report that the overall quality and longevity of the amenity contribution provided for by the trees and groups of trees within and adjacent to the site will not be adversely affected as a result of the local planning authority consenting to the proposed development. It is considered that any issues raised in the report, or beyond the scope of it can be dealt with by planning conditions.

- 6.74 In light of the above, it is considered that the proposals fully accord with the relevant policies relating to biodiversity and the aims of the NPPF.

#### **Land Contamination**

- 6.75 **Policy 5.21** (Contaminated Land) of the London Plan explains that appropriate measures should be taken to ensure that development on previously contaminated land does not activate or spread contamination.
- 6.76 **Local Plan Policy LP 10** (Local Environmental Impacts, Pollution and Land Contamination) potential contamination risks will need to be properly considered and adequately mitigated before development proceeds.
- 6.77 A Desk Study, Site Investigation & Risk Assessment Report has been prepared by Southern Testing Consultancy. The report concludes that there is no significant groundwater conditions requiring de-watering and there is no evidence of significant soil contamination in the soils encountered during the ground investigation and therefore the development can be carried out with no risk to future occupier.

#### **Surface Water and Sustainable Urban Drainage Systems**

- 6.78 Sustainable drainage is considered in **Policy 5.13** of the London Plan. This policy states a drainage hierarchy in which drainage strategies outlined in development proposals should adhere to. This includes storing rainwater for later use, use infiltration techniques and discharge rainwater direct to a surface water sewer/drain discharge rainwater to the combined sewer.
- 6.79 Local Plan **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. The policy explains that the Council will require the use of Sustainable Drainage Systems (SuDS) in all development proposal
- 6.80 The submission is supported by a Surface Water and SuDS Assessment. The SUDs Strategy explains that that the proposed scheme is feasible and compliant to appropriate best practice and regulatory requirements. In addition, the proposed SWMP included in the report will ensure that proposed development will not increase the flood risk elsewhere and the runoff will have no adverse impact on the water quality at the point of discharge.

#### **Refuse and Recycling**

- 6.81 The proposed bin store has been designed with reference to LBRuT's Refuse and Recycling Storage Requirements SPD which requires adequate storage capacity to allow for weekly collections of refuse

and recyclables.

6.82 In the case of the proposed development, the applicant submits the following regarding the waste management strategy:

- The siting and design of the bin store will not result in any adverse impact to residential amenity;
- The bin store will be easily accessed by occupiers of the proposed development and by local authority/private waste providers; and
- The bin store will not obstruct pedestrian, cyclists or driver site lines.

#### **Community Infrastructure Levy (CIL)**

6.83 Mayoral CIL 2 was adopted in February 2019. LBRuT falls within Zone 1 of the schedule whilst LBRUT adopted their CIL Charging Schedule on 1 November 2014. The Site falls within the Lower band area.

6.84 The existing buildings have been occupied in its lawful use for at least 6 months of the last 3 years, so this can be discounted from CIL liability and is to be considered in the calculated figure.

#### **Community Engagement**

6.85 The application is supported by a Statement of Community Involvement (SCI) prepared by a specialist community consultation group 'Your Shout, part of Thorncliffe. The report details the stakeholder and public consultation carried out pre-submission of the application. The report summarised the comments received during this process that, where appropriate, are reflected in the application and Design and Access Statement.

6.86 The SCI fully demonstrates the Applicant's commitment to thorough and meaningful public consultation and meets the requirements set out by LBRuT. The SCI notes that submission of the planning application does not mark the end of this consultation and the team will continue to meet with local groups and individuals as appropriate throughout this process.

6.87 The SCI details the public consultation carried out to inform the evolution of the proposals, in accordance with national and regional policies, and Richmond's Statement of Community Involvement (SCI).

## 7 Planning Balance

- 7.1 Planning decisions should be made in accordance with the development plan unless material considerations indicate otherwise.
- 7.2 Having regard to the assessment undertaken in this Statement, the application proposals would contribute to addressing the acute shortage of housing (through on-site provision) and off-site affordable housing (details to be provided in the supporting Viability Assessment provided under a separate cover) in the Borough and there are would be no material adverse impacts arising from the scheme.
- 7.3 The development would give rise to several clear benefits that weigh in favour of granting planning permission including:
- Successfully delivers the redevelopment of vacant brownfield land in a sustainable area;
  - Delivers high quality dual aspect residential accommodation with high-quality amenity space provision;
  - Would preserve character and appearance of the nearby Joanna Southcott Conservation Area (JSCA) and Metropolitan Open Land (MOL) through well considered design that is well-related to the surrounding context and neighbouring buildings;
  - Provides a quantum of development in terms of bulk, scale and massing that optimises the Site yet respects the amenity of adjacent neighbouring buildings;
  - Delivers tangible environmental gains including reduced surface water run-off, energy efficiency and ecological benefits;
  - Will generate jobs through the construction period; and
  - Will generate S106/CIL contributions which will assist in the provision of local infrastructure.
- 7.4 The Proposal generally accords with the provisions of the development plan. Whilst the density of the proposal exceeds that set out in the current London Plan, the density matrix should not be read mechanistically and a minor breach of this does not lead to the scheme breaching the entire development plan. In any case, the emerging London Plan seeks to remove the reliance on the density matrix.
- 7.5 As such, we conclude that the proposal accords with the provisions of the development plan (when considered as a whole). We have not identified any material consideration that indicate that the decision



should be made contrary to the provisions of the development plan. As such, and in accordance with paragraph 11c of the NPPF, planning permission should be granted without delay.

## 8 Conclusion

- 8.1 The application proposes the redevelopment of the Site to provide a new building containing 9no. flats (Use Class C3). In summary, the proposed development is considered to accord with the relevant national, regional and local planning policy context and represents an appropriate and suitable development for this accessible site within Hampton.
- 8.2 There is a policy priority in London Plan terms to make the most of brownfield sites. The site is currently under-utilised, and the proposed development represents an efficient use of previously developed land. The scheme will provide new, high-quality residential accommodation in a sustainable location within the borough.
- 8.3 The scheme has been designed in consultation with the LBRuT and has been assessed against key LBRuT and GLA policy considerations as well as consideration material to the determination of the application the NPPF.
- 8.4 The Scheme design responds to the surrounding character, taking inspiration from the residential character of the adjacent streets, ensuring the proposal integrates into its surroundings and enhances this part of St James's Road by providing a development of a much higher quality than what is currently located on the Site. The scheme is well functioning, visually attractive, sympathetic to the local character, optimises the potential of the Site and seeks a development which is safe, inclusive and accessible, in accordance with policy at all levels.
- 8.5 The proposals deliver tangible environmental gains including reduced surface water run-off, energy efficiency and ecological benefits.
- 8.6 It In conclusion, the proposed development is considered to be in accordance with the relevant national planning policy guidance, the development plan and emerging planning policy and there are strong material considerations that indicate why development should be permitted.

