

# Car park at St Margarets Business Centre, Godstone Road, TW1 1JS

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## PLANNING STATEMENT

PREPARED BY PEGASUS GROUP | GODSTONE DEVELOPMENTS LTD | SEPTEMBER 2020 | P20-0141

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# **PLANNING STATEMENT**

## **CAR PARK AT ST MARGARETS BUSINESS CENTRE, GODSTONE ROAD, ST MARGARETS, TW1 1JS**

**ON BEHALF OF GODSTONE DEVELOPMENTS LIMITED**

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)  
PLANNING AND COMPULSORY PURCHASE ACT 2004**

**PEGASUS REF: P20-0141**

**DATE: SEPTEMBER 2020**

## **Pegasus Group**

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## 1. INTRODUCTION

1.1 This Statement has been prepared by Pegasus Group on behalf of Godstone Developments Limited ('the Applicant'), in support of a full planning application for the following proposed development at land east of St Margarets Business Centre, Godstone Road, St Margarets, TW1 1JS ('the site'):

***"Erection of 4 no. residential dwellings (Class C3) with associated parking, access, and landscaping (incl. removal of existing trees)."***

1.2 This planning application follows pre-application discussions with Planning Officers of the London Borough of Richmond upon Thames.

1.3 This Statement sets out the planning rationale that underpins the proposed development, to demonstrate its acceptability in planning terms.

1.4 The Statement is structured as follows:

- **Section 2** provides a description of the site and the surrounding area;
- **Section 3** gives an overview of the relevant planning history;
- **Section 4** provides a description of the development proposals;
- **Section 5** sets out the planning policy context;
- **Section 6** assesses the proposals against the relevant planning considerations; and
- **Section 7** summarises and concludes the report.

## 2. SITE DESCRIPTION

### Location

- 2.1 The site is situated within the administrative boundary of the London Borough of Richmond upon Thames ('LBR'). The site is located at the corner of Drummonds Place and Winchester Road, and is bound by Godstone Road to the north. The site is approximately 0.2km south west of St Margarets Rail Station and 0.2km east of Moormead and Bandy Recreational Ground.
- 2.2 The site comprises land formerly used as a "overspill" car park associated with the St Margarets Business Centre, which adjoins the site to the south-west. The car park is surplus to the requirements and forms separate ownership from the St Margarets Business Centre, which comprises 7 no. industrial units served by adequate parking within forecourts directly to the front of the units. Forming separate ownership, the business centre no longer has use of the car park.
- 2.3 The site is largely square and measures approximately 0.06 hectares in size. A photograph of the site is included at Figure 1 below. The site is bound to the north by Godstone Road and Winchester Road to the east, which are characterised by 2-storey terraces and semi-detached residential properties.
- 2.4 The site is located approximately 250m to the west of St Margarets Railway Station and the adjoining shops and services.



**Figure 1 - Application site from Winchester Road**



- 2.5 A review of historic OS maps of the site shows that since the business centre was built in the early 1980s (planning application ref. 82/456) the site has always been utilised as a car park. A copy of the historic OS map dated 1988-92 is included at Figure 2 below, with the site circled.



**Figure 2 - Extract of OS Map showing the site from 1988-92**

- 2.6 The adopted Local Plan allocates the St Margarets Business Centre as a "*Locally Important Industrial Land and Business Park*", however the site falls outside of this designation being physically separated from it (the local plan designation includes land up to the access gates as shown in Figure 3). Accordingly, the site is not included within the employment designation and thus is considered "white land".
- 2.7 Since the grant of planning permission in 1982 for the Business Park (Ref. 82/0457), the site has always been used intermittently for overflow car parking and has never assumed an employment use. The site is also within the St Margarets Village Character Area.



**Figure 3 - Gated Access to St Margarets Business Centre**

- 2.8 The site does not lie within a Conservation Area and none of the buildings within the immediate vicinity are statutory Listed. There are two nearby Conservation Areas (Crown Road Conservation Area to the east and Amyand Park Road Conservation Area directly to the south).
- 2.9 According to the Environment Agency indicative flood maps, the site is wholly located within Flood Zone 2, which has a medium probability of flooding (between a 1 in 100 and 1 in 1,000 annual probability of river flooding).
- 2.10 A review of the Transport for London WebCAT map confirms that the site has a PTAL rating of 2, albeit the site lies within the immediate proximity of St Margarets Train Station and close to shops and services provided along St Margarets Road.
- 2.11 Whilst the site is predominately hard standing, there is vegetation on the site's perimeter, with the mature trees protected by a group Tree Preservation Order, made on 17<sup>th</sup> October 2019 (Ref. T1049 A1).

### 3. BACKGROUND AND PLANNING HISTORY

3.1 The St Margarets Business Centre was developed in the early 1980s following the grant of planning permission (ref. 82/0457) at appeal on 11<sup>th</sup> May 1987 for:

*"Demolition of existing buildings and the erection of 7 light industrial units, ancillary offices, parking and manoeuvring space."*

3.2 The application site did not form part of the built development for the St Margarets Business Centre and has solely been used as an overflow car parking area.

3.3 There are no relevant planning applications associated with the application site, however a number of pre-application enquires have been submitted, in addition to the pre-application enquiry submitted by Pegasus as detailed in Section 6, as set out below.

- **Ref. 19/P2086/PREAPP** – Residential development of the site to provide 4 no. three storey residential dwellings (4 x 4 bed dwellings) with mansard roof at second floor, two car parking spaces, 8 no. cycle spaces and associated front and rear garden;
- **Ref. 18/P0209/PREAPP** – Stage one pre-application submission to establish the principle and general site capacity for residential development of the site;
- **Ref. 16/P0287/PREAPP** - Redevelopment of the site for mixed use development, comprising of office (Class B1(a)) and residential (Class C3) uses; and
- **Ref. 09/P0022/PREAPP** - Various scheme for re-development of the site for proposed housing for apartments (Class C3) and office units (Class B1(a)).

3.4 It is noted that Unit 4 within St Margarets Business Centre has recently been subject to applications for the change of use of the unit from light industrial (Use Class B1c) to storage and distribution (Use Class B8). A summary of the applications is below:

- **Ref. 19/2907/FUL** – Change of use from light industrial (B1c) to storage and distribution (B8) – *Refused 27<sup>th</sup> November 2019.*



- The reason for refusal was as follows:

*"Highway Safety and Nuisance – The proposal, by reason of the type and use and the scale and siting of Unit 4, would in all likelihood result in additional highway movements by large delivery vehicles along narrow, heavily parked residential roads with restricted turning and reversing space and in the absence of information to the contrary, or enforceable mitigation measures, has failed to demonstrate that this scale of B8 use could operate from the unit without giving rise to significant harm to the safety of pedestrians and other users of the highway, as well as causing increased nuisance and inconvenience to the occupants of neighbouring residential properties. The proposal would therefore be contrary to Policies LP8, LP10 and LP44 of the London Borough of Richmond upon Thames Local Plan."*

- **Ref. 20/2084/FUL** – Change of use from B1c (light industrial) to mixed use B1a/B1c/B8 (light industrial, office and storage and distribution) – Validated on 31<sup>st</sup> July 2020, Currently undetermined

- 3.5 The change of use application which was refused in November 2019 (ref. 19/2907/FUL) was refused in relation to highways safety and nuisance, relating to the large delivery vehicles likely to result from the Class B8 use. The subsequent change of use application which was submitted in July 2020 has been accompanied by a Transport Statement prepared by Kronen (dated July 2020).
- 3.6 The Transport Statement refers to the application site and states that *'The business centre has a car park adjacent to the Winchester Road access that could accommodate approximately 15 x cars; the car park has no formal markings / space lining or signage, it is assumed this is unallocated visitor parking'*.
- 3.7 The Transport Statement also confirms that the 6no. on-site spaces within the existing forecourt to Unit 4 provides sufficient provision at 1 space per 70 sqm which is above the maximum requirement. The Transport Statement concludes that *'the provision exceeds the higher 1 space per 100 sqm standards but given that the proposal only seeks a change of use from B1c light industry to a mixed use B1c light industry / B1a office / B8 storage and distribution use with no external works and only minor internal alterations this is considered acceptable / not objectionable'*.

3.8 For clarity, the proposed change of use application at Unit 4 of St Margarets Business Centre does not include or rely upon the use of car park subject of this application.

2 Godstone Road

3.9 It is noted that a planning application was granted at No. 2 Godstone Road (Ref. 16/4818/FULL) on 1<sup>st</sup> March 2017 for the demolition of existing garden shed and erection of single storey side/rear extension. The rear of No. 2 Godstone Road is disguised behind a high boundary wall, although it is understood that this permission has been implemented with construction of the extension.

#### **4. DEVELOPMENT PROPOSAL**

4.1 This application seeks planning permission for 4 no. residential dwellings (Use Class C3) and associated parking, access, and landscaping. Specifically, the proposals include the erection of 4 no. townhouses which would front onto Godstone Road, with individual rear gardens and 1 no. car parking space provided for each dwelling.

4.2 A schedule of accommodation is set out in the table below, with all dwellings exceeding the National Described Space Standards (March 2015):

<b>House No.</b>	<b>No. Bedrooms / Persons</b>	<b>Total Floorspace (approx.)</b>
House 1	4 bed / 6 persons	167.6 sq m
House 2	4 bed / 6 persons	151.4 sq m
House 3	4 bed / 6 persons	145.4 sq m
House 4	4 bed / 6 persons	126.6 sq m

4.3 The dwellings will each be demised 1 no. car parking space, accessible from Winchester Road, and have storage facilities for 2 no. cycles (per household).

#### **Layout**

4.4 The siting of the proposed dwellings within the site will continue the existing building line along the residential terrace of Godstone Road. The dwellings have been positioned to front on to Godstone Road with private gardens provided to the rear/south of each dwelling.

4.5 The proposed car parking spaces for the development will be located along the southern boundary of the site.

#### **Appearance**

4.6 The proposed dwellings have been designed to reflect the existing streetscene along Godstone Road. The proposed dwellings will be two storeys in height when viewed from Godstone Road, with use of a pitched roof containing habitable accommodation (served by south-facing dormer windows).

- 4.7 The proposed dwellings will predominantly comprise red clay facing brick with white timber/composite sliding sash windows with stone window head details. The timber material will be reflecting in the eaves and doors to provide continuity throughout the elevation. Recessed brick features have been utilised to contribute towards the architectural interest of the dwellings.
- 4.8 The proposed dwellings have been designed to provide a consistent and comprehensive streetscene along Godstone Road which complements the dwellings adjacent to the site, and the wider character of the area.
- 4.9 For the rear boundary, a timber fence is proposed which is in keeping with the character of the area and will provide an appropriate privacy for the rear gardens. The existing brick wall which forms the boundary of the site along the western boundary adjacent to No. 2 Godstone Road is proposed to be retained.
- 4.10 The proposed dwellings represent a high quality development that has been designed to integrate with the surrounding context of the site. The accompanying plans, Design and Access Statement, and CGIs provide further details on the appearance of the proposed dwellings.

#### **Access and Parking**

- 4.11 The proposed dwellings will front on to Godstone Road. The proposed car parking spaces for the dwellings will be located to the rear of the proposed gardens along Winchester Road.
- 4.12 The 4 no. car parking spaces will be provided in the form of 4 end-on (2.4x6m) parking spaces, access via a shared surface crossover from a private road which provides access from Winchester Road.

#### **Landscape**

- 4.13 The proposed development will unavoidably result in the loss of existing trees onsite. Where possible, soft landscaping is accommodated within the private amenity space of the proposed dwellings, and the Applicant will seek to agree with the Council during the determination of the application appropriate off-site planting of trees to mitigate those being removed to facilitate the proposed development.

## 5. PRE-APPLICATION ENGAGEMENT

### Pre-application Enquiry

- 5.1 A pre-application enquiry was submitted by the Applicant to the London Borough of Richmond upon Thames on 4<sup>th</sup> May 2020. A virtual pre-application meeting was held on 16<sup>th</sup> July 2020 with Joanne Simpson (Planning Officer). Disappointingly, a formal response had not been received from the Council at the time of application submission (22<sup>nd</sup> September 2020).

### Engagement and Consultation

- 5.2 As highlighted within the accompanying Statement of Community Involvement (prepared by Pegasus Group), prior to the submission of this application, the Applicant has consulted with the local community, to provide the opportunity to shape and inform the development proposals in advance of the final scheme being submitted for determination. A summary of the comments received and how this has informed the design process is provided within the accompanying Statement of Community Involvement.
- 5.3 Overall, the pre-application process has provided an opportunity to highlight and address potential issues at an early stage in the planning process. The development proposals forming this application submission have been refined to address feedback which has been received.



## 6. PLANING POLICY CONTEXT

- 6.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) states that planning applications for development should be determined in accordance with the Statutory Development Plan unless material considerations indicate otherwise.
- 6.2 The Development Plan for London Borough of Richmond Upon Thames consists of the London Plan (adopted March 2016) and the Local Plan (adopted July 2018 and 3<sup>rd</sup> March 2020 in relation to two legal challenges).
- 6.3 London Borough of Richmond are also in the process of preparing a new Local Plan which will be used to guide the location, amount, and type of development the Borough needs to accommodate. The Council have carried out a Call for Sites exercise to date. It should be noted that the Applicant has submitted representations as part of the 'Call for Sites' consultation (April 2020).
- 6.4 The Council's latest Local Development Scheme (published July 2019) stages that adopted of the Local Plan is scheduled for 2024. Owing to the early stage of preparation, this document will carry no weight in decision-taking at the present time.
- 6.5 Other material considerations that are relevant to the application proposals include the following:
- National Planning Policy Framework (NPPF) (published in February 2019);
  - National Planning Policy Guidance (NPPG);
  - Adopted London Borough of Richmond and Mayoral Supplementary Planning Documents (SPDs) and Supplementary Planning Guidance (SPG); and
  - Draft London Plan (intent to adopt published December 2019).

### **National Planning Policy Framework (2019)**

- 6.6 The National Planning Policy Framework (NPPF) was published by the Government in February 2019. Chapter 2 states that "*the purpose of planning is to contribute to the achievements of sustainable development*". Further, this chapter notes that "*sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs*".

- 6.7 The NPPF stipulates that the planning system has three overarching objectives in order to achieve sustainable development, which are an economic, social, and an environmental objective, each of which are interdependent. It also states that at the heart of the Framework is the "*presumption in favour of sustainable development*".
- 6.8 **Paragraph 68** states 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.
- 6.9 **Paragraph 117-118** states that planning decisions should promote and support development of under-utilised land and buildings, including development of car parks, especially if this would help to meet identified needs for housing.
- 6.10 **Paragraph 119 (d)** states that planning policies and decisions should promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing.
- 6.11 **Paragraph 155** states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.
- 6.12 **Paragraph 157** states that all plans should apply a sequential, risk-based approach to the location of development – taking into account the current and future impact of climate change – so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by, *inter alia*, applying the sequential test and then, if necessary, the exception test.
- 6.13 **Paragraph 158** states that the aim of the sequential test is to steer new development to areas with the lowest risk of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding.
- 6.14 **Paragraph 159** states that if it is not possible for development to be located in zones with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for

the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in national planning guidance.

- 6.15 **Paragraph 160-161** states that the application of the exception test should be informed by a strategic or site specific flood risk assessment, depending on whether it is being applied during plan production or at the application stage. For the exception test to be passed it should be demonstrated that: a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. Both elements of the exception test should be satisfied for development to be allocated or permitted.

#### **London Plan (March 2016)**

- 6.16 The London Plan is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years.
- 6.17 Table 3.1 sets out the average housing supply monitoring targets between 2015-2025. For LBR, the minimum ten year target is 3,150 dwellings which represents an annual target of 315 dwellings.
- 6.18 **Policy 3.3 (Increasing Housing Supply)** states that Boroughs should seek to achieve and exceed the relevant minimum borough annual average housing target in Table 3.1.
- 6.19 **Policy 3.5 (Quality and Design of Housing Developments)** states that the design of all new housing developments should enhance the quality of local places, taking into account physical context, local character, density, tenure and land use mix.
- 6.20 Table 3.3 sets out the minimum space standards for new dwellings. The standards for 2 storey dwellings are set out in the table below:

<b>Number of Bedrooms</b>	<b>Number of Bed Spaces</b>	<b>Minimum GIA (square metres)</b>
3 bed	6 persons	102 sq m
4 bed	7 persons	115 sq m

**Adopted Development Plan**

6.21 As set out in the extract of the adopted Policies Map (Figure 4 below), the application site is not subject to any specific policy designations.



**Figure 4 - Extract of Policies Map**

6.22 St Margarets Business Centre is allocated as a Locally Important Industrial Land and Business Park within the district. The extent of the allocation is shown in the extract of the Local Plan below at Figure 5. Notably, the application site falls outside of this allocation, which stops in the location of the existing gated access (illustrated on Figure 3).



**Figure 5 - Extract of St Margarets Business Centre from Local Plan Locally Important Industrial Land Allocation**

6.23 Policies from the adopted Local Plan (adopted 2018) of relevance are set out below.

6.24 **Policy LP1 (Local Character and Design Quality)** states the Council will require all development to be a high architectural and urban design quality. To ensure development respects, contributes to and enhances the local environment and character, the following will be considered when assessing proposals:

- 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;
- Layout, siting and access, including making best use of land;
- Space between buildings, relationship of heights to widths; and
- Suitability and compatibility of uses.

6.25 **Policy LP2 (Heights)** states that the Council will require buildings to make a positive contribution towards the local character, generally reflecting the prevailing building heights within the vicinity, and respecting the local context



through appropriate scale, height, mass, urban pattern, development grain, materials, streetscape, roofscape, and wider townscape and landscape.

- 6.26 **Policy LP3 (Designated Heritage Asset)** states that 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, Scheduled Monuments as well as the Registered Historic Parks and Gardens, will be conserved and enhanced

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 or distinctiveness of the area.

All proposals in Conservation Areas are required to preserve and, where possible, enhance the character or the appearance of the Conservation Area.

- 6.27 **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:

- 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;
- 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; and

- 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.

6.28 **Policy LP10 (Local Environmental Impacts, Pollution and Land Contamination)** states that the Council will seek to ensure that local environmental impacts of all development proposals do not lead to detrimental effects on the health, safety and the amenity of existing and new users or occupiers of the development site, to the surrounding land. These potential impacts can include, but are not limited to, air pollution, noise and vibration, light pollution, odours and fumes, solar glare and solar dazzle as well as land contamination.

6.29 **Policy LP15 (Biodiversity)** states that the Council will protect and enhance the borough's biodiversity, through supporting enhancements to biodiversity, incorporating an creating new habitats or biodiversity features, including trees, into development sites and maximising the provision of soft landscaping, including trees, shrubs and other vegetation.

6.30 **Policy LP16 (Trees, Woodlands and Landscape)** states that the Council will require the protection of existing trees and the provision of new trees, shrubs and other vegetation of landscape significance that complement existing, or create new, high quality green areas, which deliver amenity and biodiversity benefits. The Council will resist the loss of trees, unless the tree is dead, dying or dangerous, or the tree is causing significant damage to adjacent structures, or the tree has little or no amenity value. The Council will require, where practicable, an appropriate replacement for any tree that is felled; a financial contribution to the provision for an off-site tree in line with the monetary value of the existing tree to be felled will be required in line with the 'Capital Asset Value for Amenity Trees' (CAVAT); require new trees to be of a suitable species for the location in terms of height and root spread, taking account of space required for trees to mature; the use of native species is encouraged where appropriate; and require that trees are adequately protected throughout the course of development.

6.31 **Policy LP21 (Flood Risk and Sustainable Drainage)** states that development will be guided to areas of lower risk by applying the 'Sequential Test' as set out in national policy guidance, and where necessary, the 'Exception Test' will be applied. The table within Policy LP21 states that for development within Zone 2, a Flood Risk Assessment and Sequential Assessment are required.

6.32 The supporting text for Policy LP21 states that future development in Zone 2 and 3a will only be considered if the 'Sequential Test' has been applied in accordance with national policy guidance, subject to some exceptions. The Sequential Test will not be required if it not major development (defined as development where the number of dwellings to be provided is 10 or more, or the site area is 0.5 hectares or more) and at least one of the following applies:

- It is a Local Plan proposal site that has already been sequentially tested, unless the use of the site being proposed is not in accordance with the allocations in the Local Plan.
- It is within a main centre boundary as identified within this Local Plan (Richmond, Twickenham, Teddington, Whitton and East Sheen).
- It is for residential development or a mixed use scheme and within the 400 metre buffer area identified within the Plan or surrounding the centres referred to above.
- Redevelopment of an existing single residential property.
- Conversions and change of use.

6.33 **Policy LP22 (Sustainable Design and Construction)** states that development of 1 dwelling unit or more will be required to complete the Sustainable Construction Checklist which has to be submitted as part of a planning application. Development that results in a new residential dwelling, will be required to incorporate water conservation measures to achieve maximum water consumption of 110 litres per person per day for homes (including an allowance of 5 litres or less per person per day for external water consumption. For carbon dioxide emissions, new residential development (under 10 units or more) should achieve a 35% reduction.

6.34 **Policy LP34 (Housing)** states that the Borough's target is 3,150 new dwellings between 2015-2025. The St Margaret's area is required to provide between 1,000 and 1,050 new dwellings within this period, along with Twickenham Riverside, North Twickenham, South Twickenham and West Twickenham.

6.35 **Policy LP35 (Housing Mix and Standards)** states that states that development should generally provide family-sized housing outside of town centres and Areas of Mixed Use, and that the housing mix should be appropriate to the location. The Policy also requires all new residential development to comply with the Nationally Described Space Standards. 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'.

- 6.36 **Policy LP36 (Affordable Housing)** sets out that for residential developments providing less than 10 units, on land where there is no loss of employment floorspace, a financial contribution will be sought. The affordable housing contribution is based upon the sales value of the properties. The table within the Policy states that the contribution that is likely to be sought would be discounted to represent 20% affordable housing.
- 6.37 **Policy LP39 (Infill, Backland and Backgarden Development)** states that all infill and backland development must reflect the character of the surrounding area and protect the amenity and living conditions of neighbours. This includes incorporating or reflecting the materials and detailing on existing dwellings, providing adequate servicing, recycling and refuse storage as well as cycle parking, and result in no unacceptable impact on neighbours in terms of visual impact, noise or light from vehicular access or car parking.
- 6.38 **Policy LP41 (Offices)** states that the Council will support a strong local economy and ensure there is a range of office premises within the borough. Any loss of office space (on sites outside the designated Key Office Areas) will only be permitted where:
1. Robust and compelling evidence is provided which clearly demonstrates that there is no longer demand for an office based use in this location and that there is not likely to be in the foreseeable future. This must include evidence of completion of a full and proper marketing exercise of the site at realistic prices both for the existing office use or an alternative office-based use completed over a minimum period of two continuous years; and then
  2. A sequential approach to redevelopment or change of use is applied as follows:
    - a. Redevelopment for alternative employment uses including social or community infrastructure uses; followed by
    - b. Mixed use including other employment generating or community uses and residential which maximises the amount of affordable housing provided as part of the mix; followed by

- c. Residential with maximum provision of affordable housing in accordance with Policy LP36 Affordable Housing.

6.39 **Policy LP42 (Industrial Land and Business Parks)** states that the borough has a very limited supply of industrial floorspace and demand for this type of land is high. Therefore, the Council will protect, and where possible enhance, the existing stock of industrial premises to meet local needs. There is a presumption against loss of industrial land in all parts of the borough. Loss of industrial space (outside of the locally important industrial land and business parks) will only be permitted where:

1. Robust and compelling evidence is provided which clearly demonstrates that there is no longer demand for an industrial based use in this location and that there is not likely to be in the foreseeable future. This must include evidence of completion of a full and proper marketing exercise of the site at realistic prices both for the existing use or an alternative industrial use completed over a minimum period of two continuous years; and then
2. A sequential approach to redevelopment or change of use is applied as follows:
  - a. Redevelopment for office or alternative employment uses.
  - b. Mixed use including other employment generating or community uses, and residential providing it does not adversely impact on the other uses and maximises the amount of affordable housing delivered as part of the mix.

6.40 **Policy LP45 (Parking Standards and Servicing)** states that the Council will require new development to make provision for the accommodation of vehicles in 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.

Appendix 3 of the adopted Local Plan sets out the maximum parking standards and states that for sites within PTAL 0-3 (such as the pre-application site), 2no. car parking spaces should be provided for 3+ bed dwellings.



**Emerging London Plan (Intend to Publish December 2019)**

- 6.41 The emerging London Plan provides updated policies to the London Plan (March 2016) which sets the overall strategic plan for London.
- 6.42 **Draft Policy GG2 (Making the Best Use of Land)** states that to create successful sustainable mixed-use places that make the best use of land, those involved in planning and development must, inter alia:
- Enable the development of brownfield land, particularly in Opportunity Areas, on surplus public sector land, and sites within and on the edge of town centres, as well as utilising small sites;
  - Prioritise sites which are well-connected by existing or planned public transport; and
  - Applying a design-led approach to determine the optimum development capacity of sites.
- 6.43 **Draft Policy H1 (Increasing Housing Supply)** states that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites, especially sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station or town centre boundary.
- 6.44 **Draft Policy H2 (Small Sites)** states that Boroughs should pro-actively support well-designed new homes on small sites (below 0.25 hectares in size) through both planning decisions and plan-making in order to,
- 1) *Significantly increase the contribution of small sites to meeting London's housing needs;*
  - 2) *Diversify the sources, locations, type and mix of housing supply;*
  - 3) *Support small and medium-sized housebuilder;*
  - 4) *Support those wishing to bring forward custom, self-build and community-led housing; and*
  - 5) *Achieve the minimum targets for small sites set out in Table 4.2 as a component of the overall housing targets set out in Table 4.1.*
- 6.45 Table 4.1 sets out the updated 10 year targets for net housing completions (2019/20 – 2018/29). For LBR, the 10 year housing target is 4,110 dwellings.

- 6.46 Table 4.2 sets out the 10 year targets (2019/20 – 2028/29) for net housing completions on small sites (below 0.25 hectares in size). For LBR, the 10 year housing target is 2,340 dwellings.
- 6.47 **Draft Policy D6 (Housing Quality and Standards)** states that housing development should be of high quality and design and provide adequately sized rooms. For private internal spaces, a dwelling with two or more bedspaces must have at least one double (or twin) bedroom that is at least 2.75m wide. Every other additional double (or twin) bedroom must be at least 2.55m wide. Where there are no higher local standards in the borough Development Plan Documents, a minimum of 5 sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sqm should be provided for each additional occupant, and it must achieve a minimum depth and width of 1.5m.
- 6.48 Consideration of the Development Plan policies, assessed against the application proposals, is provided within the following section.

## 7. PLANNING CONSIDERATIONS

7.1 This section analyses the suitability of the proposed development in the context of local and national planning policy. Starting with the principle, this section demonstrates that the proposed development represents sustainable development which is fully in accordance with the Development Plan and that there are no other material considerations which outweigh the benefits of the scheme.

### **Principle of Development**

7.2 The site was last in use as overflow car parking associated with the St Margaret's Business Centre. The site was recently sold by the business centre as was considered surplus to their requirements. The business centre has no planned expansion plans onto this land, which now forms separate legal ownership from the business centre.

7.3 Notably, the site falls outside of the area protected for employment uses as defined by the Local Plan and therefore there is no 'in-principle' presumption against its redevelopment for an alternative use.

7.4 It is noted from the pre-application meeting, that the Council consider the site to fall within employment use. However, since the construction of the business centre, the site has always been used as overflow car parking and has never been in use for employment purposes (there is no built form on the site). The site is physically separated from the St Margaret's Business Centre (with the gated entrance further to the south west) and excluded from the 'Locally Important Industrial Land and Business Park' planning allocation.

7.5 Not only is the site physically separated from the Business Centre, but it is now legally separated being in independent ownership. Accordingly, it is the Applicant's view that Local Plan Policies LP41 and LP42 are not applicable, as there will be no loss of "employment land" as a result of the proposed development.

7.6 Local Plan Policies LP41 and LP42 (which, as stated, the Applicant maintains are not applicable to this application), states that a period of marketing should be demonstrated to show the land is not suitable for its current use, or for alternative employment use. It is our view a period of marketing is not necessary as the site has never assumed an employment use since development of the St Margarets Business Centre. Nobody would be interested in acquiring the site for

its current use as a car park and alternative employment uses would require built floorspace, which does not exist onsite.

- 7.7 The provision of built employment floorspace on this site would be impractical due to the site's size and proximity to existing residential dwellings. Light industrial uses (similar to the operations carried out at St Margarets Business Centre) would negatively impact upon the residential amenity of neighbouring properties (by way of noise, traffic generation in particular), as well as look out of place within the street scene. The Council's Employment Sites & Premises Study 2019 Update published in May 2017 supports this view by stating that, in respect of the existing Business Centre, *"due to neighbouring constraints the site cannot expand"*.
- 7.8 More appropriately, the site is considered to be an infill site. Policy LP39 states that all infill development must reflect the character of the surrounding area and protect the amenity and living conditions of neighbours. In addition, Paragraph 117 of the NPPF states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions, through making use as much as possible of previously developed land.
- 7.9 The proposed development provides an opportunity to make use of previously developed land which is no longer required in its current use. This accords with Paragraph 118, part (d) of the NPPF which promotes the development of under-utilised sites especially if this would help to meet identified needs for housing and available sites could be used more effectively. In this context, Paragraph 118 specifically identified existing car parks as suitable for development.
- 7.10 With regard to the development of the site for residential dwellings, Policy LP34 (Housing) states that the Borough's target is 3,150 new dwellings between 2015-2025. The St Margaret's area is required to provide between 1,000 and 1,050 new dwellings within this period, along with Twickenham Riverside, North Twickenham, South Twickenham and West Twickenham. The Draft London Plan increases this target to 8,110 dwellings between 2019/20-2028/29 which represent a significant increase.
- 7.11 In addition, Draft Policy H2 (Small Sites) supports boroughs to proactively support well-designed new homes on small sites (under 0.25 hectares) in order to significantly increase the contribution of small sites to London's housing targets.

Table 4.2 sets out a 10 year target for net housing completions on small sites as 2,340 (annual requirement of 234 dwellings). The targets set out in the Policies are minimum targets, and therefore boroughs should seek to exceed these targets. The site provides an opportunity to contribute towards the Borough's target for bringing forward residential development on small sites.

### **Design and Siting**

- 7.12 The design of the proposed development has been developed to be in keeping with the character and appearance of the area, with particular regard to the adjacent residential dwellings located on Godstone Road and Winchester Road.
- 7.13 The proposed development comprises 4no. self-contained residential dwellings. The proposed height of the dwellings accords with the prevailing character of Godstone Road, giving the appearance of two storey townhouses with a pitched roof design.
- 7.14 Dormer windows are proposed along the rear elevation to facilitate habitable accommodation within the roofspace.
- 7.15 The layout of the proposed development has been designed to respect the existing building line of Godstone Road and will align with the adjacent residential properties. This allows the creation of a small front garden to the dwelling houses, to incorporate a low boundary treatment reflecting that of the adjacent properties. In addition, the siting of the dwellings allows for each unit to benefit from private rear gardens and a car parking space to be allocated to each unit.
- 7.16 Whilst the application site is not within a Conservation Area, there are two nearby Conservation Areas (Crown Road Conservation Area to the east and Amyand Park Road Conservation Area directly to the south). The design of the dwellings has been carefully considered to ensure that the surrounding Conservation Areas are respected and that the character of the local area is enhanced.
- 7.17 Full elevations, floor plans, including details of roof design, and CGIs have been submitted in support of this application.

### **Housing Standards**

- 7.18 The proposed development has been designed to provide a high-quality living standard and will comprise 4 x 4no. bed dwellings.

- 7.19 Policy LP35 (Housing Mix and Standards) states that development should generally provide family-sized housing outside of town centres and Areas of Mixed Use, and that the housing mix should be appropriate to the location. As the proposed development comprises 3 and 4 bed dwellings, this is considered to be suitable in this “out of town” location as it provides family-sized accommodation in line with Policy 35.
- 7.20 In addition, Policy LP35 also requires all new residential development to comply with the Nationally Described Space Standards. The minimum standards for a double bedroom should be 11.5 sqm and 2.75 m wide. The minimum gross internal floor space for a 4 bed / 6 person three storey dwelling is 106 sq m. All of the proposed dwellings exceed the internal space standards requirements.
- 7.21 Each of the proposed dwellings will also benefit from private amenity space to the rear of the dwelling which exceeds the minimum standards set out in Draft Policy D6 of the emerging London Plan.
- 7.22 The proposed development has been carefully designed to ensure that a high-quality living standard is provided.

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

- 7.23 The proposals have been carefully designed to ensure limited impact on the residential amenity of neighbouring dwellings.
- 7.24 Policy LP39 (Infill, Backland and Backgarden Development) requires infill development to reflect the character of the surrounding area and protect the amenity and living conditions of neighbours. This includes retaining appropriate garden space for adjacent dwellings, resulting in no unacceptable adverse impact on neighbours, including loss of privacy to existing homes or gardens, providing adequate servicing, recycling and refuse storage, as well as cycle parking, and resulting in no unacceptable impact on neighbours in terms of visual impact, noise or light from vehicular access or car parking.
- 7.25 The Daylight and Sunlight Assessment concludes that all of the proposed habitable rooms achieve the average daylight factors recommended and will also achieve the recommended percentage of direct skylight. All the proposed kitchen/dining rooms will achieve the annual probable sunlight hours, including in the winter months.

7.26 With regard to surrounding residential properties, the report concludes that the proposed development would have an imperceptible impact on the skylight of 25 out of the 28 windows assessed and would have a noticeable impact on the skylight of three of the 28 windows assessed. The report sets out the following justification for the infringement on the skylight of the three windows:

- W2 is a tertiary windows serving the kitchen/living room of 2 Godstone Road, with the primary and secondary windows which serve the kitchen/living room retaining excellent daylight due to their size (4.8m wide door with 11.4 sq m of glazing and 3.7m wide rooflight with 3.5 sqm glazing) which is far above the minimum recommended for kitchen/living rooms. In addition, 99.93% of the room would retain direct skylight;
- W3 is a relatively large window with 2.33 sqm of glazing, with the infringement as a result of the projecting wall adjacent to the window and the extension approved under planning application reference 16/4818/FUL, as opposed to the proposed development. The window would mean that the bedroom it serves could retain good daylight, above the minimum recommended; and
- The infringement on W5 is considered minor because the window retains a VSC of 24.81% after development proposals. Whilst this is below the recommended 27%, it is higher than many of the windows serving similar properties in the surrounding area.

7.27 Due to the justification of the infringement on the three windows, the report concludes that the proposed development's impact on the skylight of existing surrounding dwellings should be considered acceptable. The report also concludes that the proposed development would have an imperceptible impact on the sunlight of all main living rooms of existing surrounding residential buildings, and an acceptable impact on the sunlight of existing gardens.

7.28 In addition, the Noise and Vibration Impact Assessment concludes that the re-radiated noise due to train pass-by would not contribute to the overall airborne noise level experienced within the properties, and that the vibration levels from the train activity are below the threshold of human perception. The proposed mitigation includes a robust glazing specification, with no further mitigation measures being required to protect the proposed habitable spaces from external noise intrusion.

7.29 The Air Quality Assessment concludes that the development will have no adverse effects on local air quality and does not introduce new exposure within an area of poor air quality, and therefore no additional mitigation is proposed.



- 7.30 The proposed development has been sensitively designed to protect the amenity and living conditions of the neighbouring dwellings. By effectively continuing the existing terrace of Godstone Road, the proposed dwellings will not adversely impact the amenity of the adjacent dwellings with regards to outlook or privacy.
- 7.31 Appropriate recycle and refuse storage has been included to serve the proposed dwellings.
- 7.32 The proposals are considered to have a positive impact on the visual amenity of the street and will integrate with the existing dwellings.

### **Highways and Parking**

- 7.33 The application site was last used as overspill car park associated with the adjacent St Margarets Business Centre; however, this was determined to be surplus to requirements and hence it has been sold independently. Each unit within the business centre benefits from sufficient car parking within the forecourt to the front of each unit for use by visitors and staff. This includes Unit 4 of the Business Centre which is currently subject to a change of use application which will utilise the existing car parking spaces within the forecourt.
- 7.34 In addition, the loss of the application site as overflow parking will not materially increase parking on nearby residential streets, as they are controlled by existing parking restrictions which any user of the Business Centre would have to adhere to.
- 7.35 Tables 2.1 and 2.2 of the London Plan (March 2016) set out the car and cycle parking standards for residential development. The standards state that for 3+ bed dwellings up to 1.5 spaces per unit is the maximum provision, and for cycle spaces, for 2+ beds, 2 long stay spaces are required, with 1 short stay space required every 40 units. In addition, Local planning policy notes that "*an appropriate balance needs to be struck between minimising car use and ensuring development is able to operate efficiently, avoiding adding to street parking pressure.*"
- 7.36 The proposals provide a total of 4no. car parking space accessible from Winchester Road. These spaces are to be demised 1no. space per dwelling. Whilst it is recognised these do not meet the maximum car parking standards of 1.5 no. spaces per unit, a reduced provision is considered acceptable given that the site is in a sustainable location being within close proximity to St Margaret's Railway

Station (approximately a 5 minute walk), as well as several bus routes which service St Margaret's Road, including the H37 which provides a regular service between Hounslow and Richmond, and the 969 which runs daily multiple times a week providing a service between Whitton, Barns and Roehampton Vale.

- 7.37 In addition, local car ownership statistics have been taken into consideration, with the car ownership rate in the local area being assessed as 1.07, i.e. one vehicle per dwelling. As such, the provision of one space per dwelling is considered to accommodate anticipated demand from the development, with no resulting overspill anticipated from the development.
- 7.38 Furthermore, the emerging London Plan, which is currently at the 'Intend to Publish' stage, and the associated suggested changes by the Secretary of State have been taken into account. The Intend to Publish London Plan states that for Outer London for sites with a PTAL rating of 2, the maximum car parking standard is up to 1 space per dwelling. The Secretary of State's comments on the Intend to Publish version set out that for residential dwellings with 3 and above bedrooms in Outer London in an area with a PTAL rating of 2-4, the maximum car parking standard is up to 1 space per dwelling. Notably, there is no change to the car parking standards applicable to the proposed development, regardless of whether the Secretary of State's comments are accepted, with the maximum provision being 1 space per dwelling. On this basis the proposed development is considered to accord with national, regional, and local planning policy.
- 7.39 Cycle parking spaces are also proposed in line with the Council's adopted policy which requires, with 2no. cycle spaces provided.
- 7.40 The surrounding streets are subject to a Controlled Parking Zone. Should planning permission be forthcoming, a Section 106 Agreement could restrict access to parking permits and ensure the proposed residential development does not cause additional any additional parking stress within this area. On this basis, it is considered that providing 1no. car parking space per dwelling is appropriate.
- 7.41 The previous pre-application response (ref. 19/P0286/PREAPP) also indicated that a Section 106 obligation was required to restrict occupants/visitors of the St Margarets Business Park from access to parking permits. Given the business park is under separate ownership and does not form part of the application site, it would be unreasonable to impose such a restriction. Furthermore, in accordance with the NPPF Paragraph 182 ('agent of change principle') "existing businesses

and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established". The provision of 4no. car parking spaces to serve the proposed residential dwellings is therefore considered to be appropriate.

- 7.42 Access to the car parking spaces is proposed via Winchester Road to the south of the site.
- 7.43 The Transport Statement confirms that the parking provision and proposed access is acceptable for the site and provides suitable provision for the proposed development. The Transport Statement also concludes that the anticipated change in vehicular trips is considered to non-materially alter the quantum of vehicular movements on the local networks. The increase in trips on local public transport modes is considered to be negligible and the availability of bus and rail services can be considered more than sufficient to accommodate the anticipated number of trips generated by the proposed development.

#### **Affordable Housing**

- 7.44 Policy LP36 (Affordable Housing) sets out that for residential developments providing less than 10 units, on land where there is no loss of employment floorspace, a financial contribution will be sought. The affordable housing contribution is based upon the sales value of the properties, albeit the Council will have regard to the economic viability and individual site costs.
- 7.45 In accordance with Policy LP36, should planning permission be forthcoming, a contribution for affordable housing may be sought through a Section 106 agreement. An Affordable Housing Commuted Sum Calculator has been submitted with this application.

#### **Flood Risk**

- 7.46 The site is located wholly within Flood Zone 2. Policy LP21 (Flood Risk and Sustainable Drainage) states that development will be guided to areas of lower risk by applying the 'Sequential Test' as set out in national policy guidance, and where necessary, the 'Exception Test' will be applied.
- 7.47 It is acknowledged that the site is wholly within Flood Zone 2 which has a medium risk of flooding, and that the proposals represent a "more vulnerable" use due to comprising residential development. Whilst the site is within Flood

Zone 2, this is due to the site's proximity to the River Crave, approx. 0.3km to the east. Notably, according to the Environment Agency Flood Maps, the River Crane benefits from flood defences. A Sequential Test has not been undertaken for this application given the Council's guidance on whether Sequential Tests are necessary to support planning applications, as set out in Policy LP21. The Policy states that a Sequential Test is not required if the proposal is not "major development", and if it is within the 400 metre buffer area surrounding the identified centres of Richmond, Twickenham, Teddington, Whitton and East Sheen.

- 7.48 The development proposals comprise 4 no. residential dwellings which falls below the threshold for "major development". The site lies marginally outside of the Twickenham Town Centre buffer, although is still within close proximity to the centre and given the River Crane benefits from flood defences, a Sequential Test is not considered to be necessary. Further, a Sequential Test has not been requested as part of pre-application discussions.
- 7.49 The Flood Risk Assessment and Drainage Strategy Report has assessed the site and set out recommended mitigation. The Assessment states that the residual risk of flooding to the site can be effectively managed by setting the proposed buildings ground floor levels above the predicted flood level of 6.34mAOD for the 0.1%AEP.
- 7.50 In addition, a combination of green roofs, water butts, pervious pavements and below ground geocellular storage systems are proposed to minimise the rate of discharge, volume and environmental impact of surface water runoff from the development. The proposed surface water strategy for the development would ensure that flows are restricted to a maximum allowable discharge rate of 2.0l/s for all analysed rainfall events up to and including the 1 in 10 year return period with 40% allowance or climate change.
- 7.51 The Flood Risk Assessment and Drainage Report concludes that the development can be occupied and operated safely and that there will be no increase in the level of flood risk to the site or neighbouring sites because of the development.

### **Ecology and Trees**

- 7.52 Policy LP15 (Biodiversity) states that the Council will protect and enhance the borough's biodiversity and LP16 (Trees, Woodlands and Landscape) states that

the Council will require the protection of existing trees. The Council also requires that site design or layout ensures a harmonious relationship between trees and their surroundings and will resist development which is likely to result in pressure to significantly prune or remove trees.

- 7.53 The Council recently introduced a Tree Preservation Order covering the existing trees onsite. Pre-application discussions have focused upon landscaping, with Officers acknowledging that there would need to be a high degree of loss in order to facilitate development of this site. Unavoidably, the proposed development results in the loss of trees along the northern and eastern boundary which are subject of the recent Tree Preservation Order (Ref. T1049 A1).
- 7.54 However, it is understood that the Order may have expired given its six-month provisional basis. As well as significantly constraining the developable area of the site, the retention of trees would give rise to future problems in terms of amenity for future site occupants and a continual need for management and associated works applications. As demonstrated by the accompanying Arboricultural Impact Assessment, there are no "high" quality (Category A) trees at the site, with all trees to be removed identified of "moderate" (Category B), "low" (Category C) or "poor" (Category U) quality (Tyler Grange Tree Quality Survey, August 2020). However, it is acknowledged that collectively the trees provide a "greening" of the streetscene and have collective merit.
- 7.55 A total of 10no. trees are located within the site boundary which require removal. A single tree located along the eastern boundary could be retained, however it is proposed that this is replaced due to its current poor health.
- 7.56 The Applicant will seek to agree during the determination of the application an appropriate strategy for replacement tree planting through off site provision, to be secured through S106 agreement.
- 7.57 The Ecological Assessment concludes that the site is not covered by nor adjacent to any sites that are subject to statutory or non-statutory protection and none are considered likely to be negatively affected by indirect impact pathways as a result of the proposals. The report concludes that the habitats on site were found to be either of negligible ecological importance or of ecological importance within the site context only. It is considered that any proposed loss of the habitats within the site context can be mitigated through replacement native tree, shrub, hedgerow and wildflower planting.

- 7.58 In addition, trees T1 and T2, which are located adjacent to the western boundary of the site and are the two onsite trees identified as having bat roost potential, are considered unlikely to support roosting bats based on the bat survey results, and no specific mitigation is required for their removal.
- 7.59 Moreover, the report concludes that the proposals present the opportunity to enhance a site which offers little biodiversity value.

### **Energy and Sustainability**

- 7.60 Policy P22 (Sustainable Design and Construction) sets out that development that results in new residential dwellings will be required to incorporate water conservation measures to achieve maximum water consumption of 110 litres per person per day for homes (including an allowance of 5 litres or less per person per day for external water consumption. For carbon dioxide emissions, new residential development (under 10 units or more) should achieve a 35% reduction
- 7.61 The Energy Statement states that the proposed development would adopt a fabric-first approach and would be constructed in accordance with the energy hierarchy. The report estimates that energy efficiently measures would enable the dwellings to achieve a 2 percent reduction in CO2 emissions beyond the baseline emissions. It is proposed that individual air source heat pumps are installed in each of the dwellings to provide space heating and hot water and provide a further 44 percent reduction in CO2 emissions. It is estimated that a combination of energy efficiency measures and the installation of heat pumps would enable the proposed dwellings to achieve a 45 percent on-site reduction in CO2.
- 7.62 In addition, the Sustainability Statement concludes that the proposed development is considered to be a good example of a sustainable development and would have a positive economic, social, and environmental impact.
- 7.63 Policy LP22 also states that development of 1 dwelling unit or more will be required to complete the Sustainable Construction Checklist which has to be submitted as part of a planning application. A Sustainable Construction Checklist has been submitted with this application to meet this requirement.

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### **Contaminated Land**

- 7.64 Policy LP10 (Local Environmental Impacts, Pollution and Land Contamination) states that the Council promotes, where necessary, the remediation of contaminated land where development comes forward and that local environmental impacts of proposed development does not lead to detrimental effects on the health, safety and amenity of existing and new users or occupiers of the development site. This includes potential impacts relating to land contamination.
- 7.65 A Phase 1 Contamination Survey has been completed which has identified that there is potential for contamination due to the site's historic use. Further site investigation through a Phase 2 Survey can be secured by way of condition should planning permission be forthcoming.

### **Heritage**

- 7.66 Policy LP3 (Designated Heritage Asset) states that all proposals in Conservation Areas are required to preserve and, where possible, enhance the character or the appearance of the Conservation Area.
- 7.67 The application is supported by a Heritage Statement which concludes that the application site is currently considered to make a neutral contribution to the significance of the Amyand Park Road Conservation Area through setting, and is not considered to contribute to the significance of the Crown Road Conservation Area through setting.
- 7.68 The report concludes that the proposals will not result in any negative impacts on the setting of the Amyand Park Road Conservation Area and will result in no harm to the significance of the Conservation Area through a change in setting.



## **8. CONCLUSION**

- 8.1 The proposal seeks the erection of 4 no. residential dwellings at the Car Park at St Margarets Business Centre, Godstone Road, St Margarets, TW1 1JS. The proposed development also includes associated landscaping, car parking, and access.
- 8.2 The development proposal provides an opportunity to make efficient use of this brownfield site and develop high quality housing which will contribute towards the London Borough of Richmond's housing needs.
- 8.3 For the reasons set out above, it is considered that this proposal accords with the both national and local policies. As such, it is concluded that the proposal is acceptable in planning terms. Therefore, in the context of the presumption in favour of sustainable development, and Paragraph 11 of the NPPF, this proposal should be approved without delay.

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