



PROGRESS PLANNING

Planning and Affordable Housing Statement

Kingston Bridge House, Church Grove, Hampton Wick, Kingston Upon Thames, KT1 4AG

Erection of 2 storey and single storey extensions to the roof, an infill extension at ground floor level, façade improvements and change of use of the building to provide 89 residential units with associated landscaping, parking/refuse provision, and external alterations

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Executive Summary

This proposal seeks the erection of 2 storey and single storey extensions to the roof, an infill extension at ground floor level, façade improvements and change of use of the building to provide 89 residential units with associated landscaping, parking/refuse provision and external alterations.

In terms of principle of development, there is local and London Plan support to make the most efficient use of sites to deliver more housing, in particular affordable housing and to enhance the settings of conservation areas by making design improvements. The proposal is of a high quality design and will make a positive contribution to the location and surrounding conservation area. It will sit more comfortably within the site than the existing building and it would improve the visual amenity of the area.

The proposal will not impact neighbouring properties and its modest increase in height can be satisfactorily accommodated in this location without appearing overbearing on the surrounding area or unacceptably detracting from the amenities of adjoining occupiers by reason of loss of light, privacy, or outlook.

In transport terms, the site benefits from a good public transport accessibility level and a less car dependant development at this location is considered the appropriate approach for the scale and nature of the development.

Overall, the development would reflect the 12 core principles of sustainable development as set out in the NPPF. The application scheme meets the strategic policy objectives of the London Plan as well as the aims and objectives of local Council policy.

Site Description

The site is located on the northern side of Church Grove, at the corner of its junction with Hampton Court Road. The site consists of a detached building which is currently vacant. The building comprises 2 distinct elements with a part fronting onto Hampton Court Road which is 7 storeys in height and the other section fronting onto Church Grove which is 4 storeys incorporating an undercroft. The building known as Kingston Bridge House is not listed, however it is located within Hampton Wick Conservation Area. The Council's Hampton Wick Conservation Area Statement only references Church Grove once and states that *'Buildings along Church Grove are of varied styles but united by use of common materials.'* This is an interesting observation as Kingston Bridge House stands out as being materially quite different to the rest of the buildings in the street and is considered to be a negative contributor to the appearance of the Conservation Area. As mentioned in the Conservation Area Statement, the area is characterised by a mixture of property styles with Bushy Park on the opposite side of Church Grove. Although there are elements of architectural quality to the existing building, the façade is rather dull and out of keeping with the character of the area.

The building was originally built as offices but was used for student accommodation for Kingston University since 1994 until last year when it became vacant.

The site has 2 separate vehicular access points from Church Grove and benefits from parking to the rear of the building. The building is located in proximity of Hampton Wick Centre and Kingston Metropolitan Town Centre. It has a PTAL rating of 4 which is a good level of public transport accessibility and is situated approximately 350m from Hampton Wick Station and 600m from Kingston Station. The building is situated within a Controlled Parking Zone and the site is partially located within Flood Zone 2 with the rest in Flood Zone 1.

Proposed development

Planning permission will be sought for erection of 2 storey and single storey extensions to the roof, an infill extension at ground floor level, façade improvements and change of use of the building to provide 89 residential units with associated landscaping, parking/refuse provision and external alterations.

This application follows a pre-application with Richmond Council which sought advice on erection of 2 storey extensions to the roof, an infill extension at ground floor level, façade improvements, and change of the use of the building to provide 99 residential units with associated landscaping, parking/refuse provision, and external alterations.

The current application has been revised to address the feedback provided at pre-application. The main changes are:

- Reduction in height of the element of the building facing onto Hampton Court Road by 1 storey
- Reduction in the number of units from 99 to 89 residential units
- Reconfiguration of the proposed flat layouts to ensure all units are M4(2) and 10% are M4(3) compliant
- Provision of private external amenity space by providing balconies
- Façade changes including change of brick material to yellow stock appearance

- Improvements to the parking layout and landscaping
- Further to discussions with a local HA, the mix of the affordable units have been modified to address the local need

Planning History

Application: 90/2033/FUL

Date: 08/01/1991

Description: Erection of new B1 Office Development with ancillary car parking to replace existing office building

Application: 93/0819/FUL

Date: 04/10/1993

Description: Conversion of existing building to form 216 study/bedrooms in 39 self-contained flats plus one bedroom warden's flat.

Planning Policy

The proposed development would be assessed against the Development Plan Policies contained within the Richmond Local Plan, the London Plan, the NPPF and supplementary planning guidance by both the London Borough of Richmond and GLA.

National Planning Policy

In addition to the policies contained within the development Plan at a local level, the National Planning Policy Framework (NPPF) holds significant weight for decision makers.

At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. For decision-taking this means approving development proposals that accord with the development plan without delay (paragraph 14).

One of the core planning principles identified in the NPPF is to proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs.

The NPPF states that local planning authorities should approach decision taking in a positive way to foster the delivery of sustainable development. Authorities should look for solutions rather than problems, and decision-makers at every level should seek to find solutions to approve rather than refuse applications for sustainable development wherever possible.

The NPPF asserts within paragraph 49 that housing development should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up to date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites.

Housing forms a key part of the Governments' drive for sustainable development, with an objective to increase significantly the supply and delivery of new homes in communities where people want to live and to meet the needs of present and future generations.

The sustainability and design credentials goes towards its acceptability in planning terms; not only due to its location, but in line with Para.6 of the NPPF sustainability amongst other things, also includes; widening the choice of high quality homes, high quality design and construction as well as making the most efficient use of land.

Paragraph 60 requires that planning and policies and decisions should not attempt to impose architectural styles or particular tastes and should not require proposals to conform to certain development forms or styles.

Paragraph 65 states that Local Planning Authorities should not refuse planning permission or buildings or infrastructure, which promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design.

Regional Planning Policy - The London Plan & Intend to Publish London Plan

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.

The document brings together the geographic and locational (although not site specific) aspects of the Mayor's other strategies – including those dealing with:

- Transport
- Economic Development
- Housing
- Culture
- A range of social issues such as children and young people, health inequalities and food.

It provides a framework for the development and use of land in London, linking in improvements to infrastructure (especially transport); setting out proposals for implementation, coordination and resourcing; and helping to ensure joined – up policy delivery by the GLA Group of organisation (Including Transport for London).

The Mayor has also had regard to the principle that there should be equality of opportunity for all people, and to:

- Reducing health inequality and promoting Londoners' health
- Climate change and the consequences of climate change
- Achieving sustainable development in the United Kingdom
- The desirability of promoting and encouraging use of the Thames, particularly for passenger and freight transportation
- The need to ensure consistency between the strategies prepared by the Mayor
- The need to ensure consistency with national policies and international treaty obligations notified to the Mayor by Government, and
- The resources available to implement the Mayor's strategies

Local Planning Policy – Richmond Local Plan

Section 54(a) of the Town and Country Planning Act (1990) as amended by Section 38(6) of the Planning and Compulsory Purchase Act 2004 states, that Local Planning Authorities (LPA's) should determine planning applications in accordance with the Development Plan, unless material considerations indicate otherwise.

The relevant local planning authority is the London Borough of Richmond (LBR). The Development Plan for the Borough is made up of their Local Plan which superseded the Core Strategy and Development Management Plan, which sets out the boroughs policies to manage development for the next 15 years until 2035.

Principle of Development

The site is currently vacant, but its previous lawful use was for student accommodation for Kingston University.

Local Plan 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 these are on a site and in a location suitable for that particular use, and in accordance with environmental, transport, parking, and other relevant policies.

Paragraph 9.4.9 clarifies that student accommodation would be a lower priority than affordable and supported housing priorities. The existing building was in use by Kingston University and was let to students. Kingston University has replaced this accommodation with new premises in Kingston Town Centre so the application building is no longer needed for student accommodation. Given the scale of the existing building, there are no other education providers locally that would be willing to occupy the premises. The situation is made worse by the discovery recently that the external cladding to the building is in poor condition and requires replacement in the near future. The building is in poor condition and not fit for purpose. The delivery of homes and much needed affordable would meet a greater need for Richmond Council.

The London Plan encourages high quality schemes for housing developments that make more efficient use of land. Policy 3.3 (Increasing Housing Supply) of the London Plan provides explicit strategic support for the provision of housing in London, particularly in highly accessible locations such as this near to Hampton Wick and Kingston Town Centres. The site has a PTAL rating of 4 which is very accessible, particularly for Outer London.

Intend to Publish London plan Policy H1 will revise the Borough's Housing Target to provide for 21,820 homes over the plan period (2019/20-2028/29). Local Plan Policy LP34 'New Housing' also identifies the need for delivery of more housing in Richmond. As set out elsewhere in this report, the proposed residential accommodation will be to a very high standard and the design will improve the visual amenity of the area. Therefore, the proposal is considered to comply with Richmond Policy LP 38.

As mentioned above, in terms of principle of development, it is considered that the proposal will make a significant contribution towards Richmond Council's Housing and in particular its affordable need at this highly accessible location, making the most efficient use of the land, in accordance with strategic policy

LP34 and policy LP 38 of the Local Plan; policy 3.3 (Increasing Housing Supply) of the London Plan; policy H1 of the Intend to Publish London Plan; and the National Planning Policy Framework (2012).

Density and Housing Mix

Policy 3.4 of the London Plan seeks to ensure that new developments achieve the maximum intensity of use compatible with the local context and with public transport capacity. The site has a Public Transport Accessibility Level (PTAL) of 4 and is only a matter of metres from PTAL 5 (where 6 represents the highest level of public transport accessibility and 1 the lowest), and Table 3.2 'Density Matrix' of the London Plan advises that an appropriate residential density for this urban site would be in the range of 70 – 260 units per hectare (u/ha) and 200 – 700 habitable rooms per hectare (hr/ha) for a development proposal with 2.7-3 habitable rooms per unit.

The site has an area of 0.3 hectares and the proposal seeks to provide a total of 89 residential units, comprising 7 x studios, 48 x 1 bedroom units, 23 x 2 bedroom units, and 11 x 3 bedroom units. Therefore, the development would have a density of 297 units per hectare and 720 habitable rooms per hectare, which are both slightly over the density range for a site at this location. However, density on its own is not a reason for refusal and there needs to be some other form of material harm. Given the proposal largely comprises change of use of the existing building, the key issue to consider for this proposal will be the acceptability of the additional storeys in terms of impact on the character of the area and setting of the Conservation Area. Therefore, density on its own is considered to have limited value in the consideration of this proposal.

Local Plan policy LP 35 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. This site has a PTAL rating of 4, is situated metres from PTAL 5 and is situated in an area of mixed use. Nevertheless, the proposal would incorporate 11 family sized dwellings, all of which are to be affordable which will surely be welcomed to address local need. For these reasons, the proposed mix is considered appropriate in this location, in accordance with policy LP 35 of the Richmond Local Plan.

Affordable

Policy LP 36 Affordable Housing of Richmond's Local Plan states that the Council expects 50% of all housing units to be affordable and this 50% should comprise a tenure mix of 40% for rent and 10% for intermediate housing.

It also states that the affordable housing mix should reflect the need for larger rented family units and the Council's guidance on tenure and affordability, based on engagement with a Registered Provider to maximise delivery.

This scheme has been worked up collaboratively with Richmond Council, and Richmond Housing Partnership to find an appropriate quantum of affordable and mix.

The proposal seeks to provide half of the building as affordable comprising the side element facing onto Bushy Park.

The development would provide 48.15% affordable as calculated by habitable room which is considered appropriate by Richmond's Supplementary Planning Document Affordable Housing for development with a range of unit types. Although this marginally falls short of the Council's policy for affordable housing, it would meet the GLA's requirement for fast tracking as it is greater than 35% of the development.

The total development comprises 216 habitable rooms and 104 habitable rooms would be affordable.

In terms of tenure, 6 x 1 bedroom, 5 x 2 bedroom, and 5 x 3 bedroom units are to be provided as London Affordable Rent on the ground, first and second levels of Block B; 1 x 1 bedroom, 3 x 2 bedroom, and 2 x 3 bedroom units are to be provided as London Living Rent on the third floor level of Block B; and 2 x 1 bedroom, 6 x 2 bedroom, and 4 x 3 bedroom units are to be provided as Shared Ownership at fourth and fifth floor levels.

The level of each tenure as a percentage of the affordable would be 45.2% London Affordable Rent; 18.3% London Living Rent; and 36.5% Shared Ownership. This is compliant with the Intend to Publish London Plan, although it is recognised that it falls marginally short of Richmond's preferred Housing Mix. Nevertheless, the development would provide a significant contribution towards affordable and in particular provide 11 x 3 bedroom family sized units and 8 x M4(3) units as affordable. On this basis, the level of affordable being provided which is consistent with the Intend to Publish London Plan is considered to be acceptable given the nature of the conversation and other constraints.

Heritage and Design

Richmond Local Plan policy LP1 states that the Council will require all development to be of high architectural and urban design quality. The high quality character and heritage of the borough and its villages will need to be maintained and enhanced where opportunities arise.

Chapter 7 of the London Plan sets out a series of overarching design principles for development in London and policy 7.6 seeks to promote world class, high quality design and design led change in key locations.

The proposed development builds on the historic character and appearance of Hampton Wick Conservation Area. The Council's Hampton Wick Conservation Area Statement only references Church Grove once and states that *'Buildings along Church Grove are of varied styles but united by use of common materials.'* This is an interesting observation as Kingston Bridge House stands out as being materially quite different to the rest of the buildings in the street and is considered to be a negative contributor to the appearance of the Conservation Area. As mentioned in the Conservation Area Statement, the area is characterised by a mixture of property styles with Bushy Park on the opposite side of Church Grove. Although there are elements of architectural quality to the existing building, the façade is rather dull and out of keeping with the character of the area.



Kingston Bridge House

At ground floor level the building has some neo classical finishes including a simple but sophisticated parapet at roof level which we would seek to replicate. However, the main body of the building is dated in appearance and the windows are in need of replacement.



Kingston Bridge House 2

The main body of the building appears to have prefabricated concrete walling which is out of keeping with the character and appearance of the area which largely comprises brick finished buildings. Recently, the existing external cladding has been found to be unsafe from a fire perspective and as such its replacement is required. Our proposal would seek to remove the existing external walling from first floor and above to replace with a more traditional brick that matched the style and character of the area. A yellow brick matching the appearance of other properties in the streetscene will be chosen to aid in helping the building sit more comfortably in the streetscene. This differs from the original pre-application proposal which sought a darker coloured but heavier red brick. The lighter colour would also soften the building's appearance.

All of the windows would be replaced with traditional high quality timber styled sash windows of a design more appropriate to the conservation area.



Proposed Development (Church Grove)

The rustification currently featured at ground level along the Hampton Court Road elevation would be extended along the ground floor of the building facing Church Grove which would improve its appearance. 2 additional storeys would be added which would accommodate more residential units enabling this development to provide a generous level of affordable housing.

The additional height is considered to be satisfactorily accommodated on the site without appearing overbearing or dominant given the building is located centrally within the site and away from the boundaries and neighbouring properties. The design approach taken in terms of height is considered to be compatible with the existing corner site location which acts as a gateway to Hampton Wick and visual reference point from the surrounding area.

The proposed aesthetic improvements along with the use of higher quality materials is considered to genuinely improve the appearance of the site and wider setting of the Conservation Area, taking the opportunity to enhance the quality of the character in accordance with policy LP 1.

From ground and street level, the additional single storey and 2 storey roof extensions would not be particularly visible given the height of the existing building. In addition, the use of traditional high quality materials would further aid in reducing its scale when viewed from the surrounding area. Its high quality façade design would result in the building being much better articulated with traditional fenestration and balcony detailing. The use of contrasting materials and provision of period style windows would improve the appearance of the building.

This application is accompanied with a Heritage Statement prepared by Asset Heritage Consulting which considers in more detail the acceptability of the development in relation to its impact on heritage assets. This report concludes that the proposals would 'preserve' what is significant about the character and appearance of the Hampton Wick Conservation Area and the contribution that the setting of nearby heritage assets make to what is significant about them in heritage terms.

Given the design and heritage approach taken, the development is considered to sit comfortably within the site and enhance the setting of the Hampton Wick Conservation Area. On this basis, the development proposal is considered to be acceptable and compliance with LP1 of the Local Plan; policies 7.4, 7.6 and 7.8 of the London Plan; the National Planning Policy Framework (2012); and Sections 66 & 72 of the Planning (Listed Buildings & Conservation Areas) Act 1990.

Living conditions for future occupiers

The Government's national space standards contained in the Technical Housing Standards and policy 3.5 of the London Plan set out the minimum floor areas required for proposed residential units in order to ensure that they provide an adequate standard of living for future occupiers. Policies LP 8 and 35 of the Richmond Local Plan reiterates the need to comply with these standards and to provide appropriate internal and external amenity space.

The development proposals would significantly exceed the minimum internal floor space standards of policy 3.5 of the London Plan and Technical Housing Standards. In addition, all habitable rooms have access to adequate outlook and daylight in compliance with policy LP 8.

The original pre-application scheme did not incorporate balconies or external terraces. The Council raised concern regarding lack of private amenity space to each flat. The revised submission now includes private external amenity space to each flat which would meet the Mayor of London Housing SPG standard. In addition, the site is located opposite Bushy Park, Home Park and the associated play and sport facilities on offer which future occupiers would be able to utilise. On this basis, the development and its future occupants are considered to have adequate external amenity space.

Overall, the proposed residential accommodation is considered to be of a high standard to the benefit of future occupiers, in accordance with policies 8 and 35 of the Richmond Local Plan; Residential Development Standards SPD; policies 3.5, 3.6, and 7.3 of the London Plan, and the Mayor's Housing SPG.

Impact on neighbours

The proposed building would be positioned and orientated away from existing neighbouring properties to ensure that the scheme does not adversely impact occupiers therein.

The layout of the building and window placement is similar to that of the existing building and would not permit overlooking of any neighbour's existing habitable room windows. Adequate distances are also provided between the front windows and neighbouring buildings. Therefore, the proposal would not cause any loss of privacy. As such, it is considered that the development would not adversely impact neighbouring properties.

Transport Considerations

The site was previously in lawful use for student accommodation. The site has a PTAL rating of 4 and a controlled parking zone is in place on local roads.

A Transport Assessment, Travel Plan and Construction Logistics Plan prepared by Lanmor Consulting has been submitted in support of this application.

The Transport Assessment explains that there is currently two points of vehicular access to the site and one pedestrian access into the building which is achieved via Church Grove. Church Grove has a speed limit of 30mph. The footways are wide and there is a grass verge providing very good visibility from the existing access. Therefore, utilising the existing access arrangements is considered acceptable.

In terms of parking, the development will provide 28 car parking spaces with accessible bays. Given the high level of accessibility available to the public transport network, a lower level of parking provision in line with local and regional standards are recommended and this was the feedback at pre-application stage. The Intend to Publish London Plan sets out the maximum for parking PTAL 4 as less than 0.5 spaces per unit. In this highly accessible location, close to local amenities, a planned cycle route, railway stations, and Kington Town Centre, the proposed level of parking is considered to be an appropriate balance for the development. Particularly as parking surveys have shown that there is plenty of available parking in the surrounding area.

In line with regional policy, 20% of the parking will have active electrical charging with a further 20% passive. This could be secured by means of a condition.

Given that the scheme would be a fairly low parking development and as the Council are delivering cycle improvements on Church Grove and the wider area, as well as Kington forming part of the mini Hollands scheme, the propensity for future occupiers to use greener modes of transport and in particular cycle, it is important that the development provides adequate and accessible cycle parking. In total, the proposal will provide 160 cycle parking spaces in 2 integral stores at ground floor level which would be highly convenient and accessible to residents. This exceeds the standard set out in the London Plan.

In terms of servicing, the refuse stores are similarly located at ground floor level adjacent to the undercroft access. Therefore, refuse vehicles will continue to collect from the site as they current do. Refuse vehicles will be able to reverse into the site entrance and leave in forward gear. All bins stores will be located within 10m of the collection vehicle. Given the servicing arrangements are similar to existing, it is anticipated that the development will be acceptable this regard.

The accompanying Transport Assessment also considered the impact on traffic in comparison with the existing use and transport arrangements. The existing student accommodation use which had 218 students on the site with 32 parking spaces generated more trips to and from the site than the proposed use. Therefore, the proposal is likely to reduce traffic and improve the free flow of traffic locally. As such, the proposal would not have any adverse impact on the surrounding highway network.

A Travel Plan has been submitted with the application with other sustainable measures which will be implemented as part of this development to encourage wider use of sustainable modes of travel.

Overall, the parking and transport arrangements for the development which are not materially different to the existing provisions and as supported by the accompanying reports, would not raise any highway safety concerns and

safeguard the transport network, in accordance with local, regional and national planning policy.

Accessibility

In assessing this application, reference has been made to policy 3.8 'Housing Choice' of the London Plan; Approved Document M to the Building Regulations (2015).

The residential development incorporates a clear network of routes to respective entrances that are easily understandable, inclusive, safe and secure. The development will provide 10% M4(3) units with the rest achieving M4(2). Overall, the layout of the development is inclusive and will function well, creating a safe and accessible environment. 9 accessible parking bays are also to be provided. The proposal would ensure the delivery of a range of dwelling types that meet the diverse needs of Londoners and an ageing population, in accordance with regional and local planning requirements.

Flooding

The site is located partially in Flood Zone 2 with the remaining element in Flood Zone 1. As such, a Flood Risk Assessment and Drainage Strategy prepared by Lanmor Consulting has been prepared and submitted with this application.

As the proposal relates to a change of use and as confirmed at pre-application stage with Richmond Council, a sequential test would not be required. The development will not increase the size of the building footprint and therefore it will not restrict the flow of flood water or result in the loss of food storage volumes.

The accompanying Flood Risk Assessment confirms that the site will not be subject to flooding with a probability of 0.1%. An assessment of the impact of climate change will have on flood levels was completed and shows that only the southern boundary of the site could be subject to flooding from an extreme event. However, to ensure that future residents are free from flooding even in this extreme event, the ground floor will be raised 300mm above the highest estimated flood level of 7.95m AOD. As a result, the proposed building will be free from flooding and therefore safe from a flooding event with a probability of 1.0% + climate change.

In terms of access to and from the building during an extreme flooding event, the entrances onto Church Grove which is located in Flood Zone 1 would ensure a safe means of escape.

For these reasons, the proposed site is considered suitable for development, as there will be no negative impact on the flood plain, flow paths or flood storage volumes, the development will be safe from flooding and a dry access can be provided to and from the property at all times, in compliance with adopted policies.

In terms of drainage, the Drainage Strategy explains that the existing site is nearly entirely hard surfaced and the building is positively drained to the adopted surface water network. The proposed additional soft landscaping to replace and reduce the amount of hard landscaping will result in a reduction in the volume and rate of discharge leaving the site.

Foul sewage currently serves 216 students, the proposed 89 apartments will

generate 50% of the current discharge so there will no issue with the capacity for the proposed development.

As the proposed development will result in a reduction in the discharge of both foul and surface water discharges from the development, the proposal is considered to comply with drainage policies in the London Plan.

Tree and Landscaping

Policy 7.21 Tree and Woodlands of the London Plan stipulates that existing trees of value should be retained and any loss as result of development should be replaced.

Chapter 11 of the National Planning Policy Framework states that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes.

A Tree Survey prepared by GHA trees shows the location of existing trees relative to the development. An Arboricultural Impact Assessment that supports the application concludes that the principal arboricultural features within the site can be retained and adequately protected during development activities. Nor would there be any appreciable post development pressure given the nature of the proposed development.

The application is also supported with an indicative landscaping strategy prepared by Landscape Plan. It shows how soft and hard landscaping can be enhanced on site thereby improving accessibility, drainage, ecology and the visual amenity of the site. Appropriate green buffers are also provided at ground floor level between the more communal areas and the private windows / terraces of flats. All of the existing trees are to be retained and a significant quantum of native species introduced to improve the environment. For further details, it is envisaged that the application would be approved subject to an appropriate landscaping condition.

Overall, the development is considered to protect existing trees and elements of the site that are of value and enhance the quality of the development in accordance with local, regional and national planning policy.

Renewable energy/Sustainability

Policy 5.2 Minimising Carbon Dioxide Emissions of the London Plan; policy SI2 Minimising greenhouse gas emissions of the emerging London Plan; and policy DME2: Reducing Carbon Emissions of the Local Plan Part 2 Development Management Policies states that development proposals should make the fullest contribution to minimising carbon dioxide emissions.

Policy 5.7 Renewable Energy of the London Plan states that the Mayor seeks to increase the proportion of energy generated from renewable sources, and expects that the projections for installed renewable energy capacity outlined in the Climate Change Mitigation and Energy Strategy and in supplementary planning guidance will be achieved in London.

Policy 5.3 'Sustainable design and construction of the London Plan requires development proposals to demonstrate that sustainable design standards are integral to the proposal, including its construction and operation, and ensure that they are considered at the beginning of the design process. Major development proposals should meet the minimum standards outlined in the Mayor's supplementary planning guidance in terms of sustainable design.

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Policy 5.7 Renewable energy of the London Plan stipulates that major development proposals should provide a reduction in expected carbon dioxide emissions through the use of on-site renewable energy generation.

A Sustainability and Energy Statement prepared by Bluesky has been prepared to consider the sustainability of the scheme. It explains that the total reduction in emissions from energy efficiency, low carbon and renewable technologies are calculated as 38,900 kg CO₂ per year, which equates to a reduction of 52.26%. This is achieved through a range of be lean, be clean and be green measures. A 15.42% reduction is achieved by be lean measures alone and as the building has flat roofs, it is proposed that photovoltaics could be used. After the overall reductions through the measures proposed are factored in, the residential emissions are 35.529 tonnes, which requires a carbon offset payment of £63,952 (based on the carbon offset payment of £1,800 per tonne), which could be secured by S106. This approach with the measures as set out in the accompanying Suitability and Energy Statement would meet local, regional and national planning policy.

Noise

Emerging policy D12 Agent of Change of the Intend to Publish London Plan states that the Agent of Change principles places the responsibility for mitigating impacts from existing noise generating activities or uses on the proposed new noise sensitive development.

KP Acoustics Ltd has been commissioned to assess the suitability of the development from a noise perspective. A robust Noise Impact Assessment Report including an environmental noise survey has been undertaken which concludes that measured noise levels allow for a robust glazing specification to be proposed which would provide internal noise levels for all residential environments of the development commensurate to the design range of BS8233 and would be compliant with emerging policy D12 of the Intend to Publish London Plan.

Air Quality

Policy 7.14 'Improving air quality' of the London Plan states that development proposals should minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMAs) and where development is likely to be used by large numbers of those particularly vulnerable to poor air quality, such as children or older people) such as by design solutions, buffer zones or steps to promote greater use of sustainable transport modes through travel plans. It also recommends that development proposals should promote sustainable design and construction to reduce emissions from the demolition and construction of buildings. Policies GG3 and SI1 of the emerging London Plan also refers to the need to improve air quality in London to improve health and wellbeing.

Stroma Built Environment were instructed to carry out an air quality assessment for the proposed scheme. Please see the accompanying Air Quality Assessment for full details. It concludes that the proposed development is demonstrated to be below the benchmark, therefore, the development is air quality neutral in regards to transport emissions and no further mitigation is required. The proposal complies with policy 7.14 of the London Plan in terms of air quality.

Contamination

Lanmor Consulting has been commissioned to review the contamination risk to the proposed development posed by the previous uses on the site. A desktop Phase 1 Environmental Assessment has been conducted into the past and present usage of the site at Kingston Bridge House. The Phase 1 contamination land assessment has been undertaken based upon the source pathway-receptor model as defined in Part 11A of Environmental Protection Act 1990.

The current use of the site change from student accommodation to residential dwellings, the buildings are to be converted and there will be only limited excavations associated with the changes to the external parking. The proposals comprise of the conversion of the current property to 89 dwellings. Following a review of the available environmental data the overall environmental sensitivity of the site is considered to be moderate to high as it is located next to SSSI sites.

However, as set out in the accompanying Environmental Report, it is considered that in the site's current use, the risk of statutory and third party liability associated with the potential for soil and ground water contamination to be present at the site is low.

Given the low risk of contamination and nature of the proposed change of use, it is not therefore considered necessary to provide additional widespread intrusion investigation of the site. However, given there will be significant changes to the fabric of the existing building, a pre-demolition asbestos survey should be undertaken before any constructions activities are undertaken to convert the building to residential use.

This Environmental Report found no evidence of contaminants associated with the previous uses of the site that would present harm or potential to cause harm nor pollute controlled ground waters as a result of the proposed conversion. Subject to appropriate conditions relating to pre-development investigation for asbestos, the development would be safe for future users, in accordance with policy 5.21 of the London Plan and the NPPF.

Conclusion

In conclusion, we consider that the proposals, incorporating the principles established above, makes the most efficient use of the land. In terms of principle of development, there is local and London Plan support to make the most efficient use of sites to deliver more housing, in particular affordable housing and to enhance the settings of conservation areas by making design improvements. The proposal is of a high quality design and will make a positive contribution to the location and surrounding conservation area. It will sit more comfortably within the site than the existing building and it would improve the visual amenity of the area.

The proposal will not impact neighbouring properties and its modest increase in height can be satisfactorily accommodated in this location without appearing overbearing on the surrounding area or unacceptably detracting from the amenities of adjoining occupiers by reason of loss of light, privacy, or outlook.

In transport terms, the site benefits from a good public transport accessibility level and a less car dependant development at this location is considered the appropriate approach for the scale and nature of the development.

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Overall, the development would reflect the 12 core principles of sustainable development as set out in the NPPF. The application scheme meets the strategic policy objectives of the London Plan as well as the aims and objectives of local Council policy.