

STATEMENT OF COMMUNITY INVOLVEMENT

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

ON BEHALF OF GODSTONE DEVELOPMENTS LTD

PEGASUS REF: P20-0141

DATE: APRIL 2022

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PLANNING | **DESIGN** | **ENVIRONMENT** | **ECONOMICS**

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1. INTRODUCTION

1.1 This Statement of Community Involvement (SCI) has been prepared 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 3 no. residential dwellings (Class C3) with associated parking, access and landscaping."

1.2 This SCI details methods of public consultation employed in advance of the planning application submission and feedback received during the consultation process.

1.3 This document should be read in conjunction with the supporting Planning Statement which details the pre-application consultation with the London Borough of Richmond.

The Requirement to Consult

1.4 The National Planning Policy Framework (NPPF) was updated in July 2021 with Chapter 4 containing a section entitled "*Pre-application engagement and front-loading.*"

1.5 NPPF Paragraph 39 states: "*Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community.*"

1.6 NPPF Paragraph 40 states local planning authorities should "*encourage any applicants who are not already required to do so by law to engage with the local community and, where relevant, with statutory and non-statutory consultees, before submitting their applications.*"

1.7 NPPF Paragraph 41 notes: "*The more issues that can be resolved at pre-application stage, including the need to deliver improvements in infrastructure and affordable housing, the greater the benefits. For their role in the planning system to be effective and positive, statutory planning consultees will need to take the same early, pro-active approach, and provide advice in a timely manner throughout the development process. This assists local planning authorities in*

issuing timely decisions, helping to ensure that applicants do not experience unnecessary delays and costs.”

- 1.8 NPPF Paragraph 42 states: *“The participation of other consenting bodies in pre-application discussions should enable early consideration of all the fundamental issues relating to whether a particular development will be acceptable in principle, even where other consents relating to how a development is built or operated are needed at a later stage.”*
- 1.9 The London Borough of Richmond adopted its Statement of Community Involvement (SCI) in 2006 which has subsequently been amended in 2009 and 2015 to take account of changes to legislation.
- 1.10 Section 2.1 sets out the Council’s core principles for engagement, which include being meaningful, coordinated, clear and transparent, responsive and visible, inclusive and accessible, and action focused. This is to ensure that the Council’s community engagement programme informs, involves, and engages with residents.

2. APPLICATION PROPOSALS

2.1 The planning application seeks full planning permission for 3 no. residential dwellings (Use Class C3) and associated parking, access and landscaping. An extract of the site Location Plan is included in Figure 1 below.

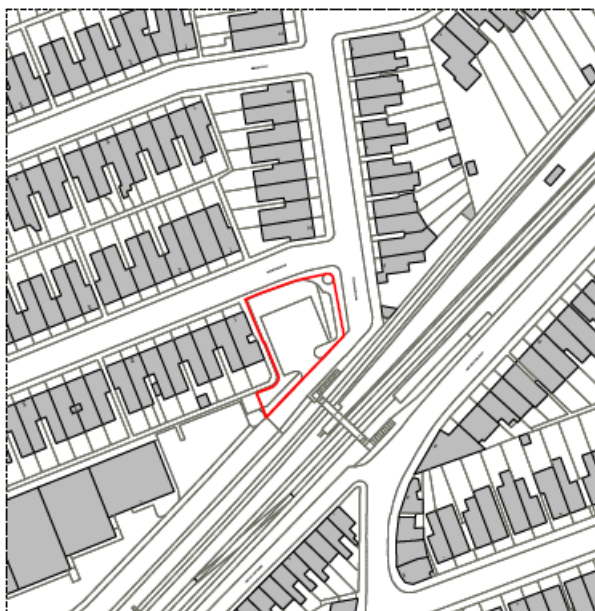


Figure 1: Extract of Site Location Plan (ref. WP-0780-A-0001-P-XX)

- 2.2 Specifically, the proposals will include the erection of 3 no. dwellings which would front onto Winchester Road, with individual front and rear gardens and 1 no. car parking space provided for each dwelling.
- 2.3 The dwellings will comprise 1 x 5no. bed, 1x 4no. bed and 1 x 3 no. bed dwellings. Each of the dwellings has been designed to national space standards and will have external private amenity space in the form of rear gardens.
- 2.4 The dwellings will each be demised 1 no. car parking space, accessible from Drummonds Place, and have storage facilities for 2 no. cycles (per household) which are proposed to be located within the front gardens.
- 2.5 A more detailed description of the development proposals can be found in the Planning Statement and Design & Access Statement which accompanies this submission.

3. CONSULTATION PROGRAMME

- 3.1 This SCI describes the process of engagement with the local community and stakeholders that has taken place prior to the submission of this application.
- 3.2 The principal method of engagement with the local community was via the production and issuing of a leaflet (reproduced at **Appendix 1**).

Issuing Leaflet via Email

- 3.3 The leaflet was initially distributed electronically to Local Councillors for the St Margaret's and North Twickenham Ward and a Godwin Residents Group on 1st March 2022. Three Councillors responded, which included a suggestion that the period of time for responding to the leaflet be extended from 15th March and further clarification is provided on the retention of the trees before the leaflet is issued.
- 3.4 The leaflet was subsequently amended which requested responses be returned by 22nd March 2022 and the wording in relation to tree retention was amended.

Letter Drop of Leaflet

- 3.5 The principal method of engagement with the local community was via a leaflet (**Appendix 1**) distributed to all properties within the immediate vicinity, as shown in Figure 2 below. The scope of the leaflet distribution was agreed with LB Richmond as part of the previous application submission at the site, and for consistency, this distribution radius remained the same.
- 3.6 The leaflets were sent to all recipients on 3rd March 2022 with a request that feedback be received by 22nd March 2022. The leaflet provided details of the draft application proposals and encouraged feedback which was considered by the design and wider consultant team prior to the submission of the application.

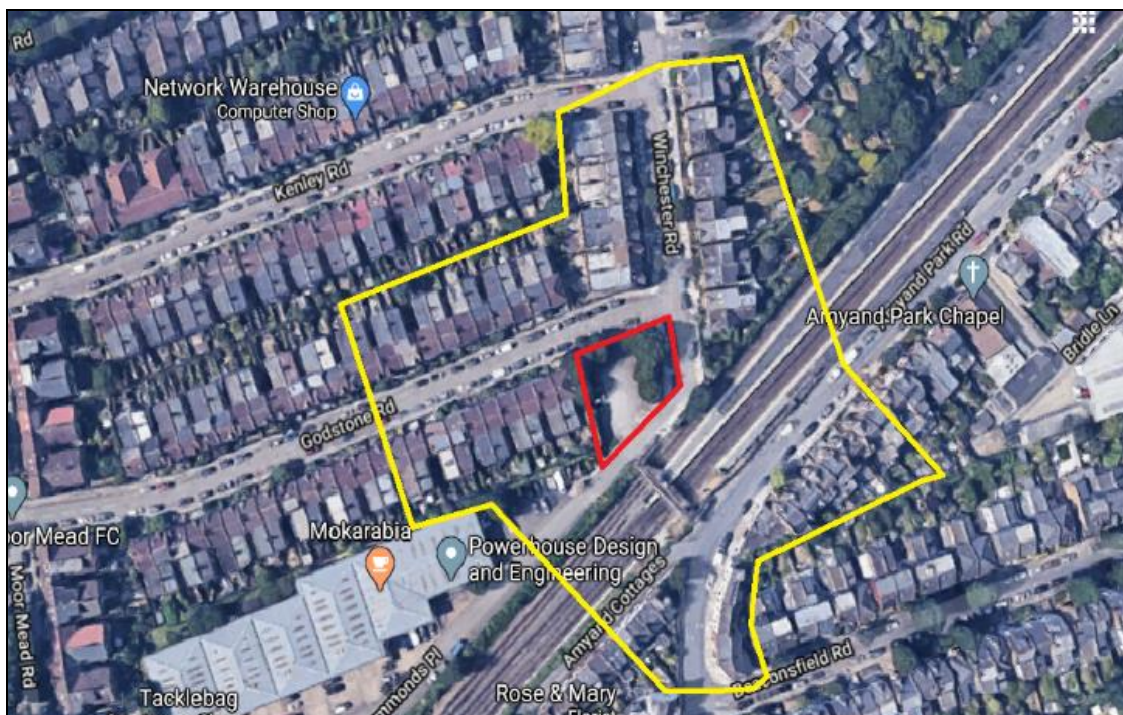


Figure 2: Letter Drop Area

- 3.7 The leaflet provided an area for comments with a freepost option to be returned to Pegasus Group as well as an opportunity to leave their email address for any future meeting with local stakeholders should this be necessary.

4. OUTCOMES AND RESPONSES

- 4.1 All of the comments received throughout the pre-application consultation and community engagement process have been recorded and summarised below.
- 4.2 There were a total of 5 responses received to the leaflet drop, all of which expressed concerns with the development proposals. Responses were also received via email from three Local Councillors within the St Margaret's and North Tottenham Ward. The responses are discussed below and a full copy of all the written responses received via leaflet is provided at **Appendix 2**, with the address/contact details omitted for data protection purposes.

Areas of Comment / Concern

- 4.3 The topics covered in the responses received are summarised below, as well as the Applicants response.

Trees / Ecology

Comments:

- There is a Tree Preservation Order on the existing trees with concerns of the removal of any trees which should be retained.
- A gap of at least three metres should be retained between the houses and the trees to protect the tree roots. Queried whether there is any provision for the protection of tree roots.
- Concerned for the bat species which depend on the shrubbery.

Applicant Response:

- 4.4 In comparison to the previous scheme at the site whereby it was proposed to remove all trees to accommodate the proposed development, the application proposals now propose the removal of 3no. existing trees, with 5no. new trees to be planted within the site, resulting in a net increase of 2no. trees. The trees to be removed are within close proximity of the proposed dwellings (blocking light / views from the proposed properties) and would be problematic from a construction perspective. The trees to be removed are not of high arboricultural quality, being Category "B" and "C" trees.
- 4.5 The Applicant's Ecologist has assessed the habitats on site as being either negligible ecological importance or of local ecological importance. Whilst no mitigation of required for the loss of negligible ecological important habitats, and

any loss of habitats of local ecological importance can be mitigated through replacement tree and native shrub planting, the site provides an opportunity to enhance the site for protected species. The proposed development would also result in an overall biodiversity net gain.

- 4.6 The Applicant has sought to design the proposed dwellings with the aspiration to retain as many existing trees as possible. This has included the re-orientation of the proposed dwellings and altering their position within the site to avoid the existing trees and their root protection zones. The Applicant will also set out any specific measures required in respect of the root protection zones during the construction phase within any forthcoming Construction Environmental Management Plan (CEMP).

Car Parking Provision

Comments:

- Requests confirmation regarding whether the proposed parking spaces will be within the Controlled Parking Zone (CPZ).
- Parking is not sufficient for the size of properties. Requests details of provision for multi-vehicle households.
- Queried how the site is underused with parking saturated in the surrounding roads.
- Queried whether the proposed parking spaces will be freehold or via a separate contractual arrangement.
- Queried whether the spaces in Drummond Place will be accessible at all times as the gates are closed at certain times.

Applicant Response:

- 4.7 The proposed development provides for 3no. car parking spaces (1no. per dwelling) which would be purchased with the freehold for each property. The Transport Statement submitted with the application provides an assessment of the surrounding roads and sets out that the average car ownership within the local area is 1.07 cars per household.
- 4.8 In addition, the London Plan (adopted March 2021) requires car-free development to be the starting point for all future development, with a maximum provision of 1no. car parking space per dwelling within the site's location (based on the location of Richmond within Greater London and the site's accessibility PTAL

rating). The Applicant has therefore proposed 1no. car parking space per dwelling which is considered to be appropriate for the area and in accordance with planning policy.

- 4.9 The Applicant is willing to enter into discussions with the London Borough of Richmond regarding the Controlled Parking Zone and the potential to restrict access to parking permits to future residents.

Design

Comments:

- The design of the houses is totally out of character with the rest of the street and the neighbourhood as a whole.
- There is a reduction in dwellings from four to three but they appear to be larger properties.
- The underneath of the houses looks ugly and would be a dominant feature at ground floor level. The top level of the dwellings is more attractive.

4.10 Applicant Response:

- 4.11 The design of the proposed dwellings has been carefully considered to be of a modern design which respects the surrounding area. The design of the scheme has included the re-orientation of the dwellings and the reduction of proposed dwellings to three. The design concept and rationale are discussed further within the Design and Access Statement submitted in support of the application.

Public Highway

Main Comments:

- The amount of public pavement space appears to be severely reduced.

Applicant Response:

- 4.12 Adequate pavement dimension is retained around the proximity of the site.

Construction Phase

Comments:

- Queried whether there would be any mitigation regarding the construction phase, including access.

Applicant Response:

- 4.13 Construction Management, including hours of working, delivery routes, dust and noise mitigation, will be controlled and agreed with the Local Planning Authority through a Construction Management Plan.

Additional Consultation

- 4.14 The Applicant has also been in direct discussion with the resident of No. 2 Godstone Road, located immediately adjacent to the site, specifically with regard to the loss of light and loss of privacy / overlooking. The Applicant also confirmed that No.2 Godstone Road is located at the ground floor level, with No.4 Godstone located on the upper floor.
- 4.15 In response to the concerns raised by the neighbouring resident of No. 2 Godstone Road, the Applicant provided a copy of the proposed first floor plan to show the relationship between the existing property and proposed development. The Applicant confirmed that there will be no overlooking due to the presence of established trees and vegetation, as well as the high boundary wall. Further, translucent glazing is proposed on specific windows to prevent westward outlook from the proposed bedroom windows.
- 4.16 The Applicant also provided a copy of the Daylight and Sunlight Assessment which has been submitted as part of the application, which concludes that the proposed development would have an acceptable impact on the skylight and sunlight of neighbouring residential dwellings.

5. CONCLUSION

- 5.1 This Statement of Community Involvement has been prepared on behalf of Godstone Developments Limited ('the Applicant') in support of an application for full planning permission at land east of St Margarets Business Centre, Godstone Road, St Margarets, TW1 1JS ('the site').
- 5.2 The Applicant has undertaken public engagement to ensure that the local community have had an opportunity to comment on the emerging development proposals in advance of submission of the planning application.
- 5.3 The SCI fully demonstrates the Applicant's commitment to thoroughly meaningful public consultation. NPPF Paragraph 39 states: *"Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community."*
- 5.4 The submission of this planning application does not mark the end of this consultation and the Applicant will continue to engage with the local community and the London Borough of Richmond as appropriate throughout the planning process.

APPENDIX 1

CONSULTATION LEAFLET



Business Reply Plus
Licence Number
RUEA-CLAT-TUSU



Pegasus Planning Group Ltd
21 Ganton Street
LONDON
W1F 9BN



WHAT HAPPENS NEXT?

Godstone Developments Ltd would welcome the feedback of local residents to these revised development proposals prior to the submission of a planning application. We would therefore appreciate if you could take time to send us your comments by **22nd March 2022** using the freepost tear off section of this leaflet.

All feedback received will be carefully reviewed and considered by the development team.



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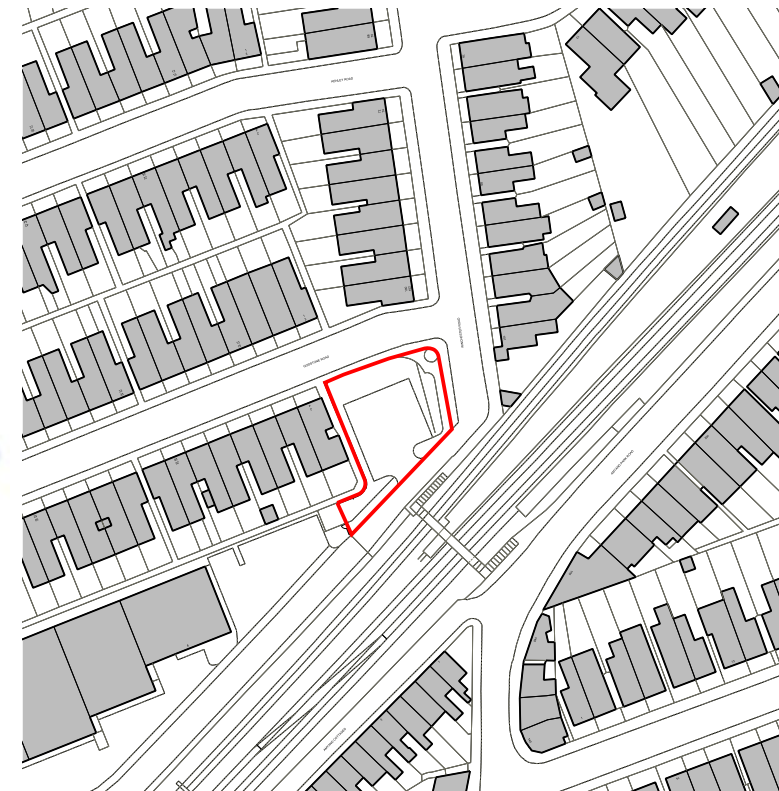
P20-0141_01 Prepared by Pegasus Group on behalf of Godstone Developments Ltd.

A GODSTONE DEVELOPMENTS LTD
PUBLIC CONSULTATION

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

Godstone Developments Ltd is seeking to redevelop the former car park serving the St Margarets Business Centre to provide 3no. contemporary family sized houses to support the local housing market, allowing the sustainable redevelopment of this underutilised, brownfield site to be brought into efficient use.

We are now seeking views from residents and the local community on the draft development proposals, before preparing and submitting a planning application to the London Borough of Richmond upon Thames.



SITE LOCATION PLAN



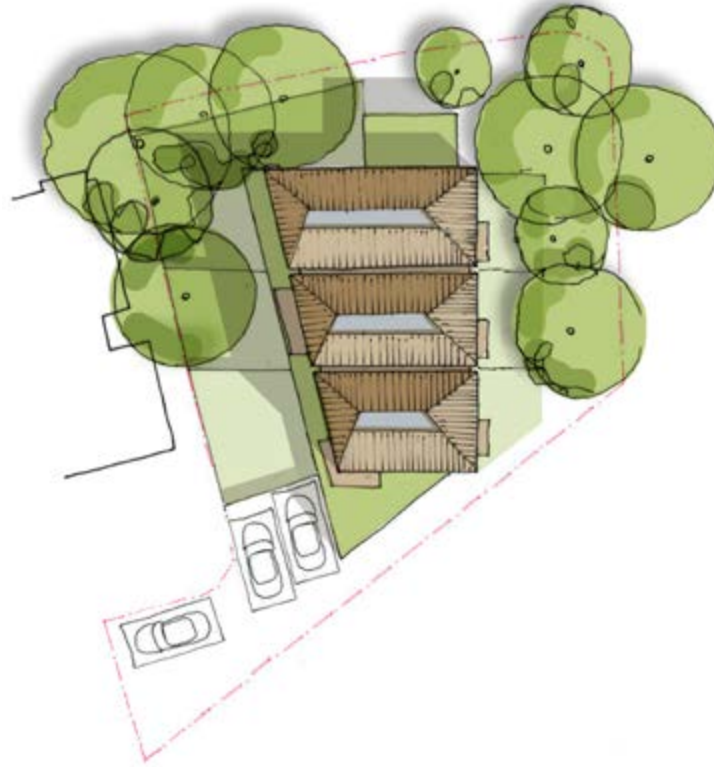
GODSTONE DEVELOPMENT LTD'S INTENTIONS & DRAFT DEVELOPMENT PROPOSALS

As many will be aware, this site was subject to a recent planning application/appeal for construction of 4no. residential dwellings fronting onto Godstone Road. The key issues set out within the appeal decision related to the loss of existing trees at the site (which are subject of a Tree Preservation Order) and the design of the rear elevation, which can be seen from the adjacent railway platform.

Godstone Developments Ltd have sought to address these issues within the draft proposals subject of this consultation.

The revised scheme designed by local architects Wimshurst Pelleriti reduces the number of houses to 3no. and orientates the dwellings so they face onto Winchester Road. This design approach allows the proposed dwellings to “bookend” Godstone Road, as is characteristic of surrounding street patterns. Furthermore, this configuration has been designed so that it would be feasible for all existing trees to be retained. However, due to proximity to the proposed development, we are exploring the removal of 2no. existing trees on the Winchester Road frontage and their replacement with fastigate formed trees of heavy stock for instant impact. These replacement trees would be located further away from the building frontages on Winchester Road. The new design approach will provide modern terraced houses. The concept sketches below illustrate the contemporary design approach to the proposed dwellings and how they will appear within the streetscene. Each dwelling will have access to 1no. car parking space accessible from Drummonds Place without compromising pedestrian or vehicular access into the business park.

PROPOSED SKETCHES



CAR PARK AT ST MARGARETS BUSINESS CENTRE

**GODSTONE RD,
ST MARGARETS, TW1 1JS**

Your comments are important to us and form part of the public consultation process for the proposals.

Comments

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Name:

Please tick the following relevant group:

Are you responding as a:

- Local resident Local business
- Representative of a group or organisation Other

We would be happy to arrange a meeting with local stakeholders to discuss the proposals. If you are interested in attending, please tick the box below and provide an email address which will be used to issue the details of any forthcoming meeting.

Any information provided will only be used by Godstone Developments Ltd and Pegasus Group Ltd for the purposes of consultation on the development proposals set out within this leaflet and will not be disclosed with any third parties in accordance with the General Data Protection Regulations.



APPENDIX 2

CONSULTATION RESPONSES

CAR PARK AT ST MARGARETS BUSINESS CENTRE

GODSTONE RD,
ST MARGARETS, TW1 1JS

Your comments are important to us and form part of the public consultation process for the proposals.

Comments

Thank you for informing us of your latest intentions. I had to draw any conclusions from these sketches, but the design of the houses is totally out of character with the rest of the street and the neighbourhood as a whole. Although there are now three instead of four, they appear to be larger properties. I find it hard to see how this will work with the proximity of the trees. In the front elevation sketch, no tree trunks are shown, just suspended garages! What provisions are made regarding the tree roots? The amount of pavement space appears to be severely reduced. Will there be any mitigation regarding the upheaval caused by building works, as access is poor and parking non-existent? We look forward to more detailed information.

CAR PARK AT ST MARGARETS BUSINESS CENTRE

GODSTONE RD,
ST MARGARETS, TW1 1JS

Your comments are important to us and form part of the public consultation process for the proposals.

Comments

I am not happy that any of the Godstone trees are removed. An explicit plan for removal + replacement, which trees etc. This drawing is not explicit.

Will new parking spaces be within the CPZ.

Parking is not sufficient for the size of property.

What provisions are being made for multi-vehicle households?

CAR PARK AT ST MARGARETS BUSINESS CENTRE

GODSTONE RD,
ST MARGARETS, TW1 1JS

Your comments are important to us and form part of the public consultation process for the proposals.

Comments

So that the roots of the trees are not disturbed, it is essential that there is a gap of at least three metres between the houses and trees.

CAR PARK AT ST MARGARETS BUSINESS CENTRE

GODSTONE RD,
ST MARGARETS, TW1 1JS

Your comments are important to us and form part of the public consultation process for the proposals.

Comments

The underneath of the houses looks very ugly and dominant. I think it would be at eye level and the part that would be dominant in terms of the street look of the street. The top half is much more attractive.

I am also concerned that we have a TPO over an existing tree, but you are putting forward the idea of taking out 2 of the existing trees. We have fought hard to keep the existing trees. We very much want to keep these.

I am worried for the protected bat species which depend on the insects in the Shrubbery.

