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Planning

# Planning and Affordable Housing Statement

Kingston Bridge House, Hampton Wick

Prepared by Progress Planning on behalf of:  
Westcombe Developments

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## Executive Summary

This statement has been prepared by Progress Planning on behalf of Westcombe Developments Limited to support an application proposal for façade and elevational improvements, infill extension at ground floor level, and change of use of the building to provide 70 new homes with associated landscaping, access, parking/refuse provision, and external alterations.

There is local, regional and national support for making more efficient use of redundant buildings. The Council support the principle of re-using the site for traditional residential use and the proposals hereby sought would significantly improve the setting of the Hampton Wick Conservation Area and nearby listed buildings.

Given the support by National Government to build the UK to a net zero future and specifically tackling the costing carbon found in construction industry, the proposal seeks the conversion of an existing building whilst bringing the design of the development to a higher quality with a new façade. The full scale of aesthetic improvements delivered such as the removal of the uncharacteristic and unsafe existing concrete cladding whilst still maintain the existing structure and providing much needed homes in the borough should be clear. Therefore, the applicant considers the proposal to be of a high-quality design which will make a positive contribution to the location and surrounding conservation area.

The proposal will strike an appropriate balance between the needs of future occupiers, the concerns of local residents and encouraging green alternative modes of transport.

Overall, the approach to this development would reflect the 17 global goals of sustainable development as set out in the NPPF. The application meets the strategic policy objectives of the London Plan as well as the aims and objectives of the Local Plan.

## The Site

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 Kingston University decided to sell the site following plans to move the majority of their student accommodation on campus, in a growing need for onsite living and lack of demand at the Kingston Bridge House site.

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. The site evidently benefits from a range of public transport services and commercial units in which to serve the future occupiers.

## Proposed development

The proposal is for façade and elevational improvements, infill extension at ground floor level, and change of use of the building to provide 70 new homes with associated landscaping, access, parking/refuse provision, and external alterations.

This application follows a withdrawal of application ref: 21/1399/FUL which sought planning permission 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 the building to provide 89 residential units with associated landscaping, parking/refuse provision, and external alterations.

Whilst the additional height was sought to provide a closer to policy compliant level of affordable housing it was unfortunately, raised as a concern due to the additional height that was being proposed as such the applicant will no longer be progressing with the extensions to the roof as part of the scheme. The proposal has been revised which primarily consist of an improved façade treatment; new landscaping strategy prepared by Studio Loci; new refuse collection layby to the front of the building; removal of roof extensions/additional storeys and the reduction of units from 89 to 70 new homes.

### Planning History

Application ref: 90/2033/FUL - Date: 08/01/1991

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

APPROVED

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.

APPROVED

Application ref: 21/1399/FUL - Date: 30/04/2021

Description: Erection of 2 storey and single storey roof extension and conversion of existing building to create 89 flats with associated works

WITHDRAWN

### 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.

### 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 much needed new homes would meet a greater need for Richmond Council.

Local, regional and national planning policy encourages high quality schemes for housing developments that make more efficient use of land, 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.

Policy H1 of the London Plan 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 at this highly accessible location, making the most efficient use of the land and supporting local shops and businesses, in accordance with strategic policy LP34 and policy LP 38 of the Local Plan; policy H1 of the London Plan; and the National Planning Policy Framework (2012).

The proposal will also provide 4 affordable units.

## Assessment of site and proposal

### Housing Mix and Affordable Housing

Policy H10 Housing size mix of the London Plan seeks to ensure a practicable mix of housing units are provided within residential schemes. These policies are supported by the London Plan Housing SPG, which seeks to secure family accommodation within residential schemes, particularly within the low cost rented sector, and sets strategic guidance for Councils in assessing their needs.

Policy H5 Threshold approach to applications of the London Plan states that a threshold level of affordable housing on gross residential development is initially set at a minimum of 35% or 50% for schemes which would result in a net loss of industrial capacity. The existing use as set out previously in this statement is student accommodation. Therefore, the London Plan would require a 35% provision of 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.

The proposal will comprise of the following breakdown in units:

Type	Units	Persons
Studio 1 person	6	6
1 Bedroom 2 person	42	84
2 bedroom 3 person	15	45
3 bedroom 4 person	7	28
Total	70	163

Figure 1 – Unit number and type

Following a Financial Viability Assessment conducted by the applicant and reviewed by the LPAs independent auditory it has been agreed that 4 affordable units can be secured.

The applicant has agreed that the following units will be affordable (**Figure 2**).

unit	type	sqm
1	3B4P	87
2	1B2P	56
3	2B3P	68
4	1B2P	66
		TOTAL

Figure 2 – Affordable housing provision

This spread of housing types is considered to meet the Council's need for family sized dwellings, in accordance with local, regional and national planning policy.

#### 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 uncommon 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.



Figure 3 - Kingston Bridge House existing elevation

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.





Figure 4 - View of Kingston Bridge House from Bridge (Existing)

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 street has been 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.

The applicant would welcome the details of the brick to be conditioned to ensure the LPA are comfortable with the quality and styling.

All of the windows would be replaced with traditional high quality timber styled casement windows of a design more appropriate to its setting and character of conservation area.

The CGIs below give a representation of how the building will be improved aesthetically.



Figure 5 - Hampton Court Road CGI elevation



Figure 6 - Church Grove CGI elevation





Figure 7 - Corner of Hampton Court Road and Church Grove CGI elevation

The key areas of how the building will be improved aesthetically are:

1. The use of recessed balconies, particularly to the Hampton Road frontage to break up the mass of the existing building, specifically where render has been used.
2. Use of a mixture of recessed and projecting balconies to add visual interest to the building and break up its appearance.
3. New and better quality justification at ground and first floor levels to enhance the appearance.
4. Use of double height justification to the element of the building facing Hampton Court Road at ground and first floor level, which will aid in grounding this part of the building, reducing its perception of height, and help contrast it with the more horizontal rear section of the building along Church Grove.
5. Use of high-quality brick slip system which would have the appearance of yellow London stock bricks which typifies the materiality of the area.
6. Installation of larger windows creating a better ratio of void space to wall.
7. Better window proportions with appropriate hierarchy of window sizes / types as it rises up the building.
8. Arched windows used in some places to add further visual interest and quality.
9. New and improved cornices that are better proportioned to the building.
10. Decorative signage added with 'KBH' (short for Kingston Bridge House) annotated along Hampton Court Road and visible from Kingston Bridge. 'Hampton Wick' has been added to the Church Grove side which would be visible from Hampton Court Road when entering Hampton Wick.

In comparison with the previous scheme, no extensions to roof level are sought. Therefore, this proposal merely relates to the change of use to residential and improved materiality. 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.

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.

For full details of the strengths of the proposed Design, please refer to the accompanying Design and Access Statement prepared by Fluent Architecture.

#### Living conditions for future occupiers

The Government's national space standards contained in the Technical Housing Standards and policy D6 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 will exceed the minimum internal floor space standards of Table 3.1 of policy D6 of the London Plan and Technical Housing Standards. Specific attention has been given to try to provide access to good levels of outlook and daylight, in accordance with the Mayor's Housing SPG and policy LP 8. The scheme would not contain North facing single aspect units.

The main entrances to the buildings would be level and the communal corridors would have rational arrangements with the provision of lifts and a stair core to service the flats conveniently located. There are also level entrances to the cycle and refuse stores.

A Noise Assessment and Air Quality Assessment have been submitted in support of the proposals. These assessments demonstrate that the internal accommodation of the flats would be to a good standard and future occupiers would not experience any poor air quality or harmful levels of noise.

The original 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. Also, a landscape strategy that includes areas of soft landscaping and play are proposed as part of the development. Please see accompanying Play and Child Occupation Assessment for more details. Nevertheless, 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 existing neighbours

The proposed development would not include any extensions that would project closer to neighbouring residents. As such, the proposal would not affect daylight, outlook or sense of enclosure of neighbouring properties.

The proposal would include replacement windows and new balconies, however, these would be situated at the same location as existing openings and as such would not give rise to any new overlooking. Therefore, the proposal is also considered acceptable in terms of privacy.

The proposed development would not harm the residential amenity of neighbouring properties and it would enhance the setting / aesthetics of the area to the betterment of the neighbourhood.

#### Accessibility

As mentioned above, all main entrances to the development will have a level entrance and all units will be step free to their respective individual entrances. In addition, all flats will have WCs on the same level as their main living areas and entrances. The accompanying Design and Access Statement and plans sets out that 16 units would be M4(3) accessible whilst the remaining flats would be M4(2). The development proposal will therefore provide at least 10% of the flats as M4(3).

Accessible parking bays (7 in total) which are conveniently located will also be situated close to the entrances of the respective blocks. The communal areas are accessible by wheelchair and the development would improve accessibility in and around the site.

Overall, the development places accessibility at its heart and the proposal will improve public access in and around the site, in accordance with local, regional and national planning policies.

#### External Amenity Space, Public Open Space, & Children's Play Space

In terms of private external amenity space, policy D6 of the London Plan states that where there are no local standards in the borough Development Plan Documents, a minimum of 5sqm of private outdoor amenity space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant, and it must achieve a minimum depth and width of 1.5m.

As set out in the accompanying Open Space Assessment, all of the units would comply with these standards, in accordance with policy D6 of the London Plan.

With regards to children's communal play space, Policy S4 Play and informal recreation of the London Plan sets out the requirements alongside the Children's Play Space SPG. The GLA helpfully provides a spreadsheet that calculates the level of play space required for each age level (see below).

As discussed in greater detail in the accompanying Play and Child Occupancy Statement, the development would have a very small proportion of its occupants under the age of 18. There is expected to be a total of 10 persons aged under 18 within the development. The GLA would usually expect play space provision of 10 sqm per child which would equate to a total level of 101.2 sqm for this development.

The Mayor's Play and Informal Recreation SPG sets out how to determine play space requirements for new developments.

In terms of accessibility to existing play provision, the site is highly accessible to existing play and recreation facilities being located opposite Bushy Park, Home Park and the associated play and sports facilities on offer for future occupiers.

There are a children's playground, tennis courts, and skatepark within 50m of the site immediately opposite on Church Grove. The site could not be any more accessible to existing play provision, as such, in this particular case, the development should not be required or tied to providing any specific level of play space within the site itself. This will encourage interaction between participants, including between residents and family members.

### Trees/Landscaping/Biodiversity

Chapter 8 Green Infrastructure and Natural Environment of the London Plan contains a number of policies relevant to this proposal. The development proposals include a new landscaping strategy for the site.

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 Studio Loci. 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.

In addition, the development would now deliver a scheme that would have an Urban Green Factor higher than 0.4, compliance with policy G5 'Urban Greening' of the London Plan. The scheme maintains a green roof and a number of ecological enhancements. Please refer to the Design and Access Statement and supporting plans for further details.

Overall, the proposals include a range of green infrastructure proposals that would enhance urban greening, biodiversity, and the setting, whilst removing a significant proportion of hard standing, therefore, the application should be supported for its green infrastructure credentials.

### Transport

Policy T1 Strategic approach to transport of the London Plan states that all development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.

Policy T4 Assessing and mitigating transport impacts of the London Plan states that the cumulative impacts of development on public transport and the road network capacity including walking and cycling, as well as associated effects on public health, should be



taken into account and mitigated. Also, development proposals should not increase road danger.

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 23 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 enter the site in forward gear and park at the front of the building and then drive off in forward gear out the secondary access to the site. 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 in 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.

#### Renewable energy/Sustainability

Policy SI2 Minimising greenhouse gas emissions of the London Plan states that development proposals should make the fullest contribution to minimising carbon dioxide emissions.

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 CO<sub>2</sub> 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 set out in the accompanying Sustainability and Energy Statement would meet local, regional and national planning policy by achieving the London Plan target to achieve a minimum 35% CO<sub>2</sub> reduction over the baseline using the new draft SAP10 carbon factors.

#### Flooding or Drainage Issues

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 70 apartments will generate less than 50% of the current discharge so there will be 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.

The Drainage Strategy prepared by Lanmor Consulting is extensive and sets out an appropriate approach to SuDS for the scheme. The development following the Sustainable Drainage Hierarchy will incorporate rainwater harvesting, and permeable paving.

For the reasons outlined above, the development will provide a robust drainage strategy for the development and the risk from flooding is considered to be low, in accordance

with policies SI 12 Flood Risk Management and SI 13 Sustainable Drainage of the London Plan.

#### Noise

Policy D14 'Noise' of the London Plan refer to the need for new residential accommodation to offer appropriate amenity safeguarded from excessive noise exposure.

The proposed development is unlikely to impact neighbouring properties given its predominantly residential use and separation of existing neighbours.

In terms of the new residential accommodation, a Noise Impact Assessment Report prepared by KP acoustics has assessed the proposal. An environmental noise survey has been undertaken to establish the current ambient noise levels.

In addition, sound reduction performance calculations have been undertaken in order to specify the minimum performance required from glazed elements in order to meet the requirements of BS8233:2014, taking into consideration the non-glazed external building fabric elements. The results of these calculations and the sound reduction performance requirements for the glazed elements are shown in the accompanying report.

The noise implications of the ventilation strategy have been considered by KP Acoustics, with options being provided to ensure that the ventilation requirements of Approved Document F are achieved.

The acoustics report concludes that no further mitigation measures will be required in order to protect future residents from external noise intrusion. Overall, the proposal is considered to be acceptable with regards to noise/vibration.

#### Air Quality

Policies GG3 and SI1 of the London Plan refer to the need to improve air quality in London to improve health and wellbeing.

Stroma Built Environment were commissioned to prepare an Air Quality Assessment for the proposed scheme as the proposals have the potential to cause air quality impacts as a result of fugitive dust emissions during construction and road traffic exhaust emissions associated with vehicles travelling to and from the site during operation, as well as expose future occupants to any existing air quality issues. As such, an Air Quality assessment was required in order to determine baseline conditions and assess potential effects as a result of the scheme.

The air quality assessment has been based on a number of conservative/worst case assumptions. This aims to provide confidence in the overall outcomes of the assessment when determining its significance. The majority of predicted NO<sub>2</sub> and PM<sub>10</sub>

concentrations at the proposed development fall within APEC Category A, which states that there are “No air quality grounds for refusal; however, mitigation of any emissions should be considered”. As such it can be determined that the proposed locations of the air intake locations are in areas which are expected to be below the UK air quality objective limits for NO<sub>2</sub> and PM<sub>10</sub>.

The Air Quality Neutral Building Assessment for the proposed development demonstrated that it is below the benchmark. As such, the development is considered air quality neutral in regards to transport emissions and therefore no further mitigation is required.

### 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 70 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, there is Local Plan, London Plan and National planning support for making more efficient use of redundant buildings. The Council support the principle of re-using the site for traditional residential use and the proposals hereby sought would significantly improve the setting of the Hampton Wick Conservation Area and nearby listed buildings.

Despite the nature of a conversion of an existing building, the design of the development is truly exceptional given the quality of the materials and full scale of aesthetic improvements delivered such as the removal of the horrible and unsafe existing concrete cladding. Therefore, the proposal is of high-quality design and will make a positive contribution to the location and surrounding conservation area.

The proposal includes transport improvements and the development will strike an appropriate balance between the needs of future occupiers and encouraging green alternative modes of transport. The development introduces a number of ecology improvements which should be welcomed.

Overall, the approach to this development would reflect the 17 global goals of sustainable development as set out in the NPPF. The application meets the strategic policy objectives of the London Plan as well as the aims and objectives of the Local Plan.