
PLANNING STATEMENT

In respect of

**CAMPION HOUSE,
OSTERLEY**

On behalf of

LINDEN HOMES

CgMs Ref: RT/JNS/5956

Date: March 2008

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EXECUTIVE SUMMARY

This report has been prepared on behalf of Linden Homes and provides a planning assessment of the proposals for the retention and conversion of Campion House and Tigar Hall, demolition of annex buildings, and redevelopment to provide 168 dwellings, a community centre, and the provision of associated open space.

In making this assessment we have considered national, strategic and local policy guidance of relevance, and had regard to an Inspector's decision in relation to a recently dismissed appeal on this site.

In conclusion, we consider that the proposal:

- provides a sustainable form of development utilising previously developed land, enhancing biodiversity and incorporating a range of measures to conserve energy and water. Based on the parameters set by the Appeal Inspector it is at an appropriate density which respects the site and surroundings and accords with the principles of guidance at a National level and the London Plan;
- has been well designed to restore the existing villa building through the demolition of its extensions, restore the existing Tigar Hall, whilst also demolishing buildings which do not contribute to the character and appearance of the conservation area and replace them with high quality buildings which reflect the most valuable elements of the existing character and appearance of the area. These aspects would preserve and enhance the character and appearance of the Conservation Area;
- allows for the release of private land into public use, providing publicly accessible open space and local facilities in an area where they are currently deemed to be deficient. It will provide a variety of planting which will enhance local ecology and in addition will accommodate an equipped play area, and formal communal gardens including a new open space on a prominent road frontage within the conservation area. It will also seek to

retain the most important existing mature trees, in particular the two cedars fronting the site, and supplement them with further planting throughout the site;

- provides sufficient parking to ensure adequate space is available for future residents without encroachment onto neighbouring roads. The main parking area has been located at basement level to enhance the appearance of the scheme and its visual impact on the surroundings, and ensure efficient use of land;
- would contribute to the Boroughs' housing needs by providing an appropriate mix of dwelling sizes from 1 bedroom flats to 4 bedroom houses. Furthermore, it would also provide 63 affordable homes also at a variety of dwelling sizes which includes 44 social rented and 19 intermediate homes, making a significant contribution to the targets in the Mayor's Draft Housing Strategy;
- has taken into consideration the opinions of local residents and stakeholders through consultation and these views have contributed significantly to the form of the current scheme.
- is smaller in scale than previous application schemes, limiting the amount of affordable housing and other planning obligations it can support. The evidence on Economic Viability and Affordable Housing Provision submitted to the Council examines the development economics of the proposal and indicates that the scheme can provide a maximum reasonable proportion of 37.5% affordable housing, and that a greater proportion of affordable housing sought would reduce the level of contributions available, and vice versa.

1.0 INTRODUCTION

1.1 This statement has been prepared by CgMs Ltd on behalf of Linden Homes in support of an application for the retention of Campion House and Tigar Hall and redevelopment of land to provide 168 dwellings with associated parking, access and landscaping. The layout has been redesigned following the dismissal of a scheme by the Secretary of State for 239 units in July 2007.

1.2 The planning application has been submitted following extensive pre-application discussions with officers of the Council in addition to consultations with the local community and other interested parties.

1.3 In addition to this Planning Statement, the following documents which have also been prepared for this scheme, need to be read in conjunction with this report:

- Transport Impact Assessment by T A Millard
- Travel Plan by T A Millard
- Design and Access Statement incorporating a Statement of Community Involvement by John Thompson & Partners, and incorporating a Landscape and Visual Statement by Neil Tully Associates
- Conservation Area Statement incorporating a Design and Access Statement for Campion House and Tigar Hall by John Thompson & Partners
- Daylight/Sunlight Appraisal by Mike Sindic
- Sustainability Appraisal by CgMs Ltd incorporating:
 - i. Desk Study and Interpretive Site Investigation Report by T&P Regeneration
- Wind assessment by RWDI Anemos
- Noise Assessment by noise.co.uk
- Ecological Assessment by ECOSA Ltd
- Energy Strategy by Spencer Mayes
- Flood Risk Assessment by Glanville Group

1.4 This report is set out as follows. The site characteristics and its surroundings are outlined initially, followed by relevant planning history. The statement then goes on to fully assess the planning merits of the proposed development. Having regard to the Appeal Inspector's assessment of the site and surrounding area, it is then concluded that the proposal complies with the prevailing planning policy

framework and makes efficient use of previously developed land, provides an appropriate element of affordable housing and new publicly accessible open space, whilst also enhancing the character of the site and surrounding area.

2.0 SITE LOCATION AND DESCRIPTION

- 2.1 The original boundary of the Campion House site enclosed an area of 3.26ha. It is this boundary that is referred to in the planning application documents, where they refer to an area of 3.26ha. However, shortly before the 2007 public inquiry commenced, a small parcel of land occupied by 104 Thornbury Road was sold off, and has been excluded from the new application site boundary which covers some 3.22ha.
- 2.2 The site fronts onto Thornbury Road to the east and the application site has an approximate frontage length of 185 metres. The depth of the site is approximately 165 metres. Access to the site is currently via three entrances along Thornbury Road with the principal entrance lying midway along the frontage opposite the Thornbury Road Junction with Church Road.
- 2.3 It lies adjacent to residential properties along Thornbury Avenue to the north, and cul-de-sac developments at Kilberry Close and Oakley Walk to the South. A large Indian Gymkhana Club and sports ground (designated as Local Open Space on the UDP Proposals Map) lies to the west accessed from Thornbury Avenue and provides hockey, cricket and football facilities including all weather sport pitches.
- 2.4 The eastern side of Thornbury Road opposite the site and to the north of Church Road comprises semi-detached properties that are elevated above road level and effectively greater in height than two storeys. Full three storey flats are found to the south of Church Road. To the south of the site there is a further three storey flatted development whilst to the north two storey semi-detached dwellings. Beyond the site boundaries, the surrounding area is predominately residential in character and comprises a mix of two to four storeys in height.
- 2.5 The site comprises a redundant residential seminary within Use Class C2 (residential institutions). The existing buildings are concentrated on the eastern part of the site and range in height from one storey upwards, with Campion House being the tallest and the equivalent of a modern 5 storey residential block. Most of the buildings fronting Thornbury Road are 3 storeys in height.

The Council have included Campion House on the list of buildings of local townscape character and consider it contributes to local architectural and historical interest.

- 2.6 The site falls within the designated Spring Grove Conservation Area. The accommodation block and classrooms were constructed in the 1960's. These together with Bethlehem and Nazareth House are considered to not contribute to the character and appearance of Campion House or the conservation area.
- 2.7 Landscaping across the site includes a number of mature and semi-mature trees along its boundary, including two mature cedars, with the exception of the southwest. The site is visible from near distance views only and is well screened by the vegetation on the boundaries of the site and the adjacent built form. The topography of the site is comparatively flat.
- 2.8 This site is some 200 metres off the junction of Thornbury Road and the A4, an arterial route which runs east-west into Central London. The location provides a good level of public transport accessibility as several bus routes pass along these roads.
- 2.9 The bus stop for route H28 lies directly in front of the site heading in both directions whilst bus route H91 lies on the A4 Great West Road within walking distance. Furthermore it is within walking distance of Osterley Station on the Piccadilly line, and to the mainline railway station at Isleworth to the south of the site with access to Waterloo. There is an existing cycle route along the northern section of Thornbury Road and along the northern and southern sides of the A4.
- 2.10 There are local facilities including a café and newsagent on the A4 opposite the junction with Thornbury Road. There are schools within reasonable walking distance as highlighted in the Transport Assessment accompanying this application, as well as a wide range of services and facilities at Hounslow town centre, a Metropolitan Centre. The site has a PTAL of 2 based on figures provided by Transport for London.

- 2.11 Private gardens of the former seminary form the western part of the site, but like the sports ground adjacent to it are designated as Local Open Space on the UDP Proposals Map. Despite this designation the whole of the Campion House site is defined as previously-developed land under national planning guidance. Previously developed land is defined within Annex B of PPS3 as that which is or was occupied by a permanent structure, and includes all of the land within the curtilage of the development, i.e. the area of the land attached to the building. The application of this principle to the proposed development scheme is discussed later in this report.
- 2.12 In making this judgement about the appropriate layout for the Campion House scheme, it should be noted that none of the open land complies with the statutory definition of a playing field for the purposes of the Planning Acts as set out as out in the "*Town and Country Planning (Playing Fields) (England) Direction 1998*". We understand that there has been no material use of any part of the seminary gardens as a playing field for at least the last 10 years.
- 2.13 The Planning Inspector in his report relating to an earlier scheme stated that he was not convinced the land in question can be considered a playing field as such, worthy of retention, and due to a surplus of sports pitches in the borough which would be improved through s106 funding, the loss of the pitch was not a major disadvantage of the scheme.

3.0 RELEVANT PLANNING HISTORY

- 3.1 Examination of the Council's planning register reveals no recent relevant planning application decisions, prior to those discussed below.
- 3.2 Applications for planning and conservation consent were submitted on 26 April 2006 with the former seeking the: *Retention of Campion House and existing gate lodge to the South of the site, demolition of existing annex and outbuildings, and the redevelopment of the site including conversion of Campion House and erection of two new buildings ranging from 3-5 storeys to create 273 units*; and the latter seeking the: *Demolition of existing extensions to Campion House and associated outbuildings including the Chapel, Refectory, dormitories and classrooms*.
- 3.3 The applications were appealed on the grounds of non-determination on 6 October 2006.
- 3.4 Revised proposals were prepared and applications submitted on 4 December 2006. These sought to respond to the concerns raised by the Council and local residents in relation to the initial application. This sought the: *Retention of Campion House and existing gate lodge to the South of the site, demolition of existing annex and outbuildings, and the redevelopment of the site including conversion of Campion House and erection of two new buildings ranging from 3-5 storeys to create 239 units*; and the; *Demolition of existing extensions to Campion House and associated outbuildings including the Chapel, Refectory, dormitories and classrooms*.
- 3.5 The second scheme was appealed on the grounds of non-determination on 13 February 2007. A request was made to conjoin these appeals with those already submitted. An inquiry date of 19 June 2007 was provided.
- 3.6 The applications were subsequently reported to the Sustainable Development Committee on 28 March 2007. The officer's report concluded that the revised proposal overcame some of the reasons on which the initial scheme was refused,

had an appeal not been lodged on the grounds of non-determination and that other reasons could be overcome by the imposition of conditions and/or securing obligations through a Section 106 agreement. However, the following reasons for refusal were recommended had a further appeal not been lodged on the grounds of non-determination:

1. The proposed development by reason of its position, size, design and appearance and landscaping would have an undue adverse impact on the street scene and on the setting of Campion House. The proposed development would therefore be contrary to UDP Policies IMP.5.1 (High quality building and urban design), ENV-B.1.1 (New development), ENVB.2.6 (Identification and protection of buildings of local townscape character), ENV-B.2.7 (Alterations to listed buildings and buildings of local townscape character), H.1.1 (Location of new housing development), H.4.1 (Housing standards and guidelines) and ENV-N.2.7 (Trees and community woodland); Policies 4B.1 (Design principles for a compact city), 4B.11 (Heritage conservation), 4B.10 (London's built heritage) and 3D.12 (Biodiversity and nature conservation) of the London Plan; and UDP Supplementary Planning Guidance (February 1997).

2. The proposed development by reason of its position, size, design and appearance and landscaping would neither preserve nor enhance the character or appearance of the Spring Grove Conservation Area contrary to UDP Policies IMP.5.1 (High quality building and urban design), ENVB.1.1 (New development), ENV-B.2.2 (Conservation areas), ENV-B.2.6 (Identification and protection of buildings of local townscape character), ENV-B.2.7 (Alterations to listed buildings and buildings of local townscape character) and ENV-N.2.7 (Trees and community woodland); and Policies 4B.1 (Design principles for a compact city), 4B.11 (Heritage conservation), 4B.10 (London's built heritage) and 3D.12 (Biodiversity and nature conservation) of the London Plan.

That, had the applicant not appealed, the application for conservation area consent no.01119/ M/CA2 to the demolition of existing extensions to Campion House and associated outbuildings, including the chapel, refectory, dormitories and classrooms would have been refused because, in the absence of an acceptable redevelopment of the site, the proposed works of demolition would be contrary to UDP Policies ENVB.1.1 (New development), ENV-B.2.2 (Conservation areas), ENV-B.2.3 (Reuse of redundant historic buildings) and ENV-B.2.7 (alterations to listed buildings and buildings of local townscape character).

3.7 An addendum to the committee report was presented at the meeting, and Members requested that a third reason for refusing the planning application be added which related to open space. This was endorsed at the Sustainable Development Committee on 30 April 2007 and stated the following:

Given the proposed level of encroachment upon the Local Open Space in an area of Publicly Accessible Open Space Deficiency the proposed development would be contrary to UDP Policies ENV-B.1.1 (New development), ENV-N.1.11 (Protection and improvement of Local Open Space), ENV-N.1.10 (Provision of new local open space) and ENV-N.1.12 (Retention of playing fields) and Policies 3D.7 (Realising the value of open space) and 3D.10 (Open space provision in UDP's) of the London Plan.

- 3.8 The applicants withdrew the first appeal by email dated 27 April 2007.
- 3.9 The inquiry sat for 5 days on 19-22 and 26 June 2007. The Inspector dismissed the appeals by letter dated 18 July 2007 citing two main reasons. These were the effect on the character and appearance of the area, and the impact on the provision of local open space.
- 3.10 In his conclusions the Inspector outlined that the scheme would undoubtedly bring some benefits to the area, including making use of an area of redundant previously-developed land; a new area of public open space in an area of deficiency; repair and restore the locally listed Campion House to beneficial use; and bring new housing including a substantial number of affordable units in a range of sizes and tenures.
- 3.11 Further, through the course of the applications and appeals, the applicant and Council agreed that a number of matters could be agreed or controlled by condition. They included:
- The principle of residential development on the site
 - Noise
 - Air quality
 - Flood risk
 - Wind
 - Contamination
 - Residential Density
 - Nature conservation
 - Daylight and sunlight
 - Privacy
 - Refuse and recycling

- Lifetime Homes standards
- Mix of unit sizes
- Affordable housing provision
- Community infrastructure
- Highway impact and parking provision
- Sustainable building principles
- Level of private and communal amenity space

3.12 Whilst these aspects of the previous scheme were deemed acceptable, they are reassessed within this report. However, in essence, the issues that remain for a scheme of a reduced scale principally relate to the impact on the character and appearance of the area and the extent of benefits justifying encroachment onto land designated as Local Open Space.

3.13 In terms of other relevant planning history, a planning application for the retention of a 2.4m security hoarding was refused in September 2006. This was subsequently granted on appeal subject to a three year time limit, expiring 31 August 2009. It will have to remain in place until a scheme for the redevelopment of the site has been approved.

4.0 PLANNING POLICY GUIDANCE

4.1 The following section briefly considers national, strategic and local planning policy guidance of relevance to the proposed development. Section 38(6) of the Planning & Compulsory Purchase Act 2004 requires that planning applications should be determined in accordance with the provisions of the Development Plan unless material considerations indicate otherwise. The local development plan comprises the Spatial Development Strategy for London (2008) and the London Borough of Hounslow First Amendment Unitary Development Plan (UDP) 2007.

4.2 London Plan policies of relevance to the applications in particular include 2A.1; 3A.1; 3A.2; 3A.3; 3A.5; 3A.6; 3A.8; 3A.9; 3A.10; 3A.17; 3A.18; 3C.1; 3C.2; 3C.22; 3C.23; 3D.8; 3D.13; 3D.14; 3D.15; 4A.1; 4A.3; 4A.4; 4A.7; 4A.14; 4A.18; 4A.19; 4A.20; 4A.21; 4A.33 4B.1; 4B.3; 4B.5; 4B.8; 4B.7; 4B.11; 6A.4; and 6A.5.

Relevant Policies in the UDP of relevance include IMP.2.1; 6.1; H.4.1; 4.4; 4.5; C.2.1; ENV-B.1.1; 1.9; 2.2; 2.3; 2.6; 2.7; ENV-N.1.10; 1.11; 1.6; 2.3; 2.3A; 2.4; 2.5; 2.6; 2.7; 2.8; ENV-P.1.1; 1.3; 1.4; 1.5; 2.1; 2.4; T.1.2; 1.4; 2.1; 2.2; 4.3; and 4.6.

4.3 Relevant Supplementary Planning Guidance (SPG) produced by the Council including Air Quality, Planning Obligations, and the Unitary Development Plan SPG.

National Policy Guidance

4.4 Relevant guidance is contained in PPS1 (Delivering Sustainable Development) 2005; PPS3 (Housing) 2006; PPS9 (Biodiversity and Geological Conservation) 2005; PPS12 (Local Development Frameworks) 2004; PPG13 (Transport) 2001; PPG15 (Planning and the Historic Environment) 1994; PPG17 (Sport & Recreation) 2002; PPS22 (Renewable Energy) 2004; PPS23 (Planning and Pollution Control) 2004; PPG24 (Planning & Noise) 1994; and PPS25 (Development & Flood Risk) 2006.

- 4.5 Relevant Supplementary Planning Guidance published by the Mayor includes: Accessible London; Housing; Sustainable Design and Construction; Providing for Children and Young People's Play and Informal Recreation; Draft Housing Strategy; Energy Strategy; and Improving Londoner's Access to Nature.
- 4.6 Relevant Circulars include 11/95: The Use of Conditions in Planning Permission; and 05/05: Planning Obligations.

5.0 THE DEVELOPMENT PROPOSALS

- 5.1 The scheme proposes a total of 168 units. The scheme would include the conversion of Campion House itself at the northern end of the site into apartments. A community facility will be provided within another converted existing building, Tigar Hall, at the south-east corner of the site.
- 5.2 This scheme is divided into 25 no. 4 bedroom houses, 16 no. 3 bedroom family maisonettes, 9 no. 1 bedroom apartments, 114 no. 2 bedroom apartments and 4 no. 3 bed apartments. 105 of these units will be private housing whilst the remaining 63 units will be affordable housing.
- 5.3 In relation to the levels of affordable housing provision 2 units will be one-bedroom, 45 units two-bedroom, and 16 units three-bedroom. The total provision of affordable housing units is therefore 37.5% of the total.
- 5.4 The proposed buildings would be set in a number of interlinked landscaped open spaces of different character. These would comprise formal garden areas along the Thornbury Road frontage, to the rear of Campion House and the courtyards within the proposed residential areas. The Design and Access Statement shows the provision of children's play space within the open space proposed fronting Thornbury Road.
- 5.5 The main vehicular access to the site will be obtained from the south-eastern corner of the site, with secondary access at the north-eastern corner of the site facing Thornbury Road. Pedestrian access to the site, the residential accommodation and the open spaces will be via a series of points along the Thornbury Road frontage.

6.0 APPRAISAL

Introduction

6.1 In light of the policy objectives outlined above and having regard to the reasons for refusal for the previous scheme on this site and the Inspector's decision, the following issues will be addressed:

- Land Use;
- Socio-Economic and Community Infrastructure;
- Design;
- Transport and Infrastructure; and
- Environmental Impact.

Land Use

6.2 The proposal seeks consent for a new residential development on a site now surplus to requirements having previously been occupied as a residential seminary.

6.3 Consultation on the previous schemes on this site acknowledged that there is a need for housing and that the site is currently underused containing unsightly existing buildings. It is generally acknowledged that the principle of residential development is acceptable, subject to the impact of the proposed development on the issues highlighted in paragraph 6.1 above.

6.4 All existing buildings other than the locally listed Campion House and Tigar Hall will be demolished and replaced with new high quality residential accommodation.

HOUSING

Numbers

- 6.5 A total of 168 new dwellings are proposed in the planning application. These will comprise a range of 1, 2 and 3 bedroom apartments, 3 bedroom maisonettes, and 4 bedroom houses as outlined within Section 5 of this statement. It is proposed that 37.5% of the housing will be affordable, and within this 70% social rented and 30% intermediate.
- 6.6 The Mayor is keen to ensure that as many additional homes as possible are delivered each year. There is a strategic housing target for Hounslow to achieve 445 additional homes per year between 2007/8 and 2016/17 contained within table 3A.1 of the London Plan. Policy 3A.2 of the London Plan advises that Boroughs should seek to exceed this figure. The London Plan also recognises that more housing capacity can be achieved through redevelopment and applying higher densities.
- 6.7 There is no guidance at the local level in terms of the number of homes that the LPA are seeking.
- 6.8 The proposal will therefore assist the Council in achieving and exceeding their London Plan housing targets.

Density

- 6.9 Density is a measure of the number of dwellings which are accommodated on a site. PPS3 does not specify density levels other than to identify a minimum of 30 dwellings per hectare (dph). It does however state that regard should be had to the criteria within paragraphs 16 and 46 of the PPS in relation to design quality and the efficient use of land.
- 6.10 The approach reflects the advice contained within PPS1 which encourages the provision of higher density development and the use of previously developed

land and buildings. It aims to promote development that creates socially inclusive communities, including suitable mixes of housing.

- 6.11 Paragraph 50 of PPS3 states that the density of existing development should not dictate that of new housing by stifling change or requiring a replication of existing style or form, and that if done well, imaginative design and layout of new development can lead to a more efficient use of land without compromising the quality of the local environment. The proposals at Campion House follow this guidance and are considered to make a positive contribution to the housing stock in Hounslow.
- 6.12 The West London Sub-regional Development Framework stresses that significant appropriate increases in densities are needed in order to meet housing targets. It is recognised that the sub-region's larger sites are better able to accommodate higher densities.
- 6.13 In order to accord with Policy 3A.3 of the London Plan which aims to maximise the potential of sites, a residential development at Campion House, with a PTAL that falls within the category of 2-3 and an average dwelling size of between 3.1 - 3.7 habitable rooms would need to adopt a residential density range of 40-80 dph (150-250 habitable rooms per hectare (hrh) (Table 3A.2 of the London Plan).
- 6.14 The site area for the purpose of the density assessment has been based on the recommendation of the Planning Inspector's report to the earlier scheme which states that for the purposes of density calculation the developable area should not include at least 1ha and be based on a maximum of 2.26ha.
- 6.15 As outlined within paragraph 2.1, following the disposal of 104 Thornbury Road, the site area is now 3.2ha, which in turn provides an area of 2.2ha based on the Inspector's recommendation to delete 1 ha. The density based on both 2.26ha and 2.2ha is assessed below.
- 6.16 Based on the 2.6ha, the net density of housing on the Campion House site, based on 168 dwellings (617 habitable rooms) will be 74 dwellings per hectare

(dph) (273 hrh). Based on 2.22ha, the net density of housing will be 76 dph (280 hrh). Both of these fall within the parameters contained within table 3A.2 of the London Plan in relation to dph, and marginally outside that relating to hrh. The Council does not have an adopted policy relating to density.

- 6.17 It is considered that the proposed density accords with the policy framework set out in the London and national policy guidance documents, and reflects the London Plan density ranges which are a guide rather than a rule.
- 6.18 To summarise, the site is a previously developed site within the urban area and a sustainable location with easy access to Central London. The proposal accords with Government policy, the thrust of which is to make better use of land by improving design, increasing densities and maximising the potential of previously developed land, and UDP Policy IMP.2.1. It is considered that this proposal fulfils all these criteria and is an excellent example of a sustainable development.

Affordable Housing Provision

- 6.19 PPS3 sets out the Government's objectives for the provision of and the need to widen housing opportunity and choice, seeking to influence the type and size of housing to address the needs of the local community. It states that developers should bring forward 'proposals for market housing which reflect demand and the profile of households requiring market housing, in order to sustain mixed communities. Proposals for affordable housing should reflect the size and type of affordable housing required' (Para. 23).
- 6.20 Policy 3A.9 of the London Plan seeks a strategic target of 50% of provision to be affordable, and within that 70% should be provided as social rented and 30% intermediate accommodation. Policy 3A.10 goes on to state that Boroughs should seek the maximum reasonable amount of affordable housing when negotiating on individual schemes, and should have regard to the need to encourage rather than restrain development. Targets should therefore be applied flexibly, taking account of site costs, public subsidy and scheme requirements.

- 6.21 The Mayor's Draft Housing Strategy states at Policy Statement 1.1 that the Mayor is seeking 50,000 new affordable homes in the three years starting in April 2008. In addition Policy Statement 1.1.e sets a target of 42% of new social rented to have three bedrooms or more, with 8% of intermediate housing to be family accommodation by 2008/2009.
- 6.22 Of the total 63 affordable housing units, 44 are proposed as social rented and 19 as intermediate. In relation to the social rented, 2 are 1 bedroom, 26 are 2 bedroom and 16 are 3 bedroom. All of the intermediate units are proposed as 2 bedroom units.
- 6.23 It is considered that the proposals conform to the policy requirements at the London-wide and local level in ensuring that the development will provide choice and allow a wider access to housing types in line with national guidance. It meets the requirements of a 70:30 split between social rented and intermediate housing, and whilst not achieving 42% of social rented to have 3+ bedrooms, it is a target within a draft document and the 36% provided is close to achieving this target.
- 6.24 Further, the room sizes proposed for the two bedroom units fall within the Council's UDP SPG as providing for 3 persons, thereby allowing for flexibility in occupation.
- 6.25 The intermediate units, whilst all two bedroom, are also above the room size guidance within the Council's Supplementary Planning Guidance which indicates that anything over 57sq.m can accommodate 3 persons. These units could therefore be considered as both family and non-family units.
- 6.26 Whilst it is acknowledged that the guidance target of 50% provision is not achieved in relation to the proposed number of affordable housing units, it should be acknowledged that it is just that, 'a target'. National and local policies require that the actual amount and type of affordable housing is negotiated with the Council on a site by site basis.

- 6.27 In this regard evidence on Economic Viability and Affordable Housing Provision has been prepared by Atiseal Ltd and submitted to the Council. This examines the development economics of the proposal and indicates that the scheme can provide a maximum reasonable proportion of 37.5% affordable housing, subject to an estimated £1million S106 contribution. A greater proportion of affordable housing sought would reduce the level of contributions available, and vice versa.
- 6.28 The proposals will also ensure that the difference between tenure will be indistinguishable, in that it will be apparent neither in terms of the architecture nor in terms of location of accommodation.
- 6.29 Whilst the proposal will not 'pepper pot' the affordable housing provision in its strictest sense as the provision is located within three terraces and blocks, they are nonetheless located around the same courtyard areas and share the same areas of open space as the private units. As a consequence an element of social mix and inclusion will occur. The layout of affordable provision within individual blocks is generally a Residential Social Landlord's preferred option since it is more practical when it comes to servicing.
- 6.30 It is therefore considered that Policy 3A.5 'Housing Choice, Policy 3A.9 'Affordable Housing Targets', Policy 3A.10 'Negotiating Affordable Housing in Individual Private Residential and Mixed Use Schemes', and Policy 3A.17 'Addressing the needs of London's diverse population' of the London Plan are complied with.

Mix of Unit Sizes

- 6.31 The proposed mix of unit sizes is set out within Section 5 of this statement. It shows how a broad mix of accommodation sizes will assist in ensuring that the proposals are a balanced and sustainable community. To this end, it adopts the guidance set out in PPS3 (Para's 20, 23, 24) by recognising that new housing development should contribute to the creation of mixed communities having regard to the proportions of households that require market or affordable housing and the existing mix in the locality. This is emphasised by paragraph 20 which states that the key characteristics of a mixed community are a variety of

housing, particularly in terms of tenure and price and a mix of different households such as families with children, single person households and older people.

- 6.32 There is no saved UDP policy relating to mix. However, the proposal provides a range of dwelling sizes and types of new housing which satisfies a wide range of housing needs, and seeks an appropriate mix subject to site characteristics.
- 6.33 In light of this, the overall mix provided for this scheme seeks approximately 5.2% 1 bedroom flats, 67.9% 2 bedroom flats, 2.4% 3 bedroom flats, 9.5% family maisonettes and the remaining 15% as 4 bedroom houses.
- 6.34 The proposed mix in relation to the affordable housing units has been discussed above, and has been shown to comply with the targets set within the Mayor's Draft Housing Strategy.
- 6.35 In relation to the remaining units, the Strategy states that there is no clear case for intervention in the market sector (Section 1: paragraph 21). Nevertheless, in order to encourage the creation of mixed and sustainable communities, the private units will provide a mix which comprises 7no. 1 bedroom dwellings; 69 no. 2 bedroom dwellings; 4 no. 3 bedroom dwellings and 25 no. 4 bedroom dwellings. In addition and as already expressed, the proposed room sizes allow for units to be utilised as family and non-family accommodation.
- 6.36 The scheme therefore complies with national policies to encourage more dwellings to meet the needs of smaller households, whilst also providing a proportion of larger family accommodation. It also reflects the existing mix in the locality which comprises of both dwellings and flats whilst addressing planning guidelines at Policy 3A.5 of the London Plan.
- 6.37 Policy 3A.5 of the London Plan states that all residential development is required to meet Lifetime Home Standards and at least 10% should meet wheelchair accessibility standards. The 16-point list of Lifetime Homes Standards covers aspects such as approach and access to dwellings, accessibility of lifts, corridors and communal areas, inclusion of wheelchair turning circles, appropriate cill

heights and socket heights, and future adaptability. All of the proposed new-build dwellings will meet the majority of the standards and a proportion of dwellings will be fully Lifetime Homes compliant.

Community Facilities

- 6.38 The London Plan (Policy 3A.18) notes that the need for social infrastructure and community facilities is important in major areas of new development.
- 6.39 In terms of the provision of community facilities, Policy IMP.6.1 of the UDP states that the Council will enter into a planning obligation to secure benefits related to the proposed development.
- 6.40 It is proposed to provide a new community facility at Tigar Hall, an existing building which was formally a prayer hall, which is to be refurbished. This building has in the past been used for such purposes, in particular for classical music renditions. These proposals are examined in more detail within the Socio-Economic and Community Infrastructure section of this statement.

Open Space, Play Space and Amenity Space

- 6.41 The open space for the new community has been designed to be an intrinsic feature of the quality of the new neighbourhood. The open space is currently undervalued, underused and inaccessible at present. The proposals aim to raise its profile and value and integrate it more fittingly within the community. The proposals in relation to play space and amenity space are examined in more detail within the Socio-Economic and Community Infrastructure section of this statement.
- 6.42 The issue of encroachment onto the area of Local Open Space is outlined below, with a more detailed evaluation contained within the discussion paper in Appendix A of this statement.

Open Space

6.43 In order to facilitate development which provides a proposal that makes effective use of previously developed land, provides affordable housing and necessary contributions whilst remaining viable, as with the earlier scheme it has been necessary to encroach upon the existing area of open space to the west of the existing buildings.

6.44 The discussion paper sets out the justification for the limited encroachment proposed by the new scheme. To summarise:

- Development plan policies allow construction of buildings on land designated as local open space in very special circumstances. For the revised scheme these include:
 - Achieving an area of open space which provides multiple functions in line with PPG17
 - Adequate private amenity space to meet UDP standards
 - Provision of local publicly accessible open space in an area with a deficiency of local open space and associated facilities
 - Reconfiguration of the open land pattern on the site, to include more open land on the main road frontage, and new and enhanced views into the depth of the site
 - Provision of a mix of housing that includes a significantly higher proportion of houses with gardens than would be possible if development stuck rigidly to the open land line defined in the UDP
- In combination, these benefits amount to the very special circumstances which justify the construction of the proposed housing on the southern part of the designated local open space at the Campion House site.

Play Space

- 6.45 The proposed play area is located in a focal position close to proposed flats to maximise natural surveillance. The proposals have been produced taking into account the UDP standards which exceed the Mayor's SPG on Play and Informal Recreation.
- 6.46 Consequently the space proposed accords with the Mayors SPG, Policies ENV.N.1.10, H.4.4, H.4.5, and Appendix 4 of the UDP.

Amenity Space

- 6.47 In relation to private amenity space the UDP SPG incorporates a guideline that two and three habitable room units require 25sq.m per unit, four habitable rooms units require 30sq.m per unit, and six habitable rooms should provide 75m² amenity space per unit.
- 6.48 The terraced, 4 bedroom dwellings provide approximately 35m². Whilst this falls below the SPG guideline, the location of these units within a shared area of private open space, and adjacent to an area of publicly accessible open space which would include children's play space to serve the occupants of the scheme as well, is considered to adequately supplement the private provision.
- 6.49 In relation to the flatted development the levels of communal amenity space would easily meet the needs of those flats that do not have individual private gardens (or access to small shared spaces such as at the Campion House building), as well as making up any shortfall in garden-sizes set out above.
- 6.50 In total, the 168 units proposed would generate a UDP SPG amenity space requirement of 0.56ha. The level of private and shared space sought will be 0.88ha, far exceeding this requirement. In addition, 1.45ha of publicly accessible open space and residents playspace will be provided.

- 6.51 The total private levels of amenity space, whilst not always according with the standards sought for individual properties, exceed the standards as an overall total. In addition the future residents would benefit from the publicly accessible open space and play space provision forming part of the proposal itself. The proposed levels therefore accord with the standards within the UDP SPG. The provision and improvement of Local Open Space also accords with Policy ENV.N.1.10 and N.1.11.

SOCIO-ECONOMIC AND COMMUNITY INFRASTRUCTURE

- 6.52 One of the objectives of the proposals is to create a vibrant, inclusive and secure community to accord with the main principles in PPS1 and PPS3. The inclusion and integration of an extensive range of high standard residential and community facilities, along with financial contributions towards off-site facilities such as education aims to achieve this.
- 6.53 A central theme of the proposal is the creation of a neighbourhood, and to attain this extensive consultation with the local population has taken place which has resulted in the Statement of Community Involvement (SCI). This has been prepared by John Thompson & Partners and should be read in conjunction with this statement. Many of the principles of the scheme have been informed by the outcomes of the community engagement process. This accords with PPS1 which states that 'community involvement is an essential element in delivering sustainable development and creating sustainable and safe communities'.

The contribution of mixed housing tenure and size

- 6.54 The proposal would provide a socially inclusive, strong, vibrant and sustainable development including a suitable mix of housing types incorporating affordable housing. It will also accord with PPS1, which aims to '*promote development that creates socially inclusive communities, including suitable mixes of housing*', as well as the objectives of PPS3, which stresses the importance of securing a wide choice of high-quality homes, both affordable and market housing which meet the needs of all of the community, including ensuring that there are enough family homes. The proposal also accords with Policy 3A.5 of the London Plan,

and the Draft Mayor's Housing Strategy as outlined within the Land Use section of this statement.

6.55 PPS3 stresses the importance of developers bringing forward '*proposals for market housing which reflect demand and the profile of households requiring market housing, in order to sustain mixed communities. Proposals for affordable housing should reflect the size and type of affordable housing required*'.

6.56 In terms of the intermediate units these play an important strategic role in the wider economy since they provide housing for key workers such as nurses, teachers, the police and other public sector employees. Without these workers London could not provide key services such as health, education and policing to its population thus preventing economic growth. Also they provide a vital stepping stone for existing members of the community to enter the private housing market freeing capacity in the social housing sector and improving the long-term financial security of individuals and families.

6.57 All of the proposed new-build dwellings will meet the majority of the standards and a proportion of dwellings will be fully Lifetime Homes compliant. This will provide flexible and accessible living accommodation, which is in accordance with Policy 3A.5 and 4B.5 of the London Plan, Implementation Point 12 and 13 of the London Plan SPG: Accessible London, and Policy H.4.1 of the UDP.

Education

6.58 The proposal will provide contributions towards primary and secondary school places as part of a package of s.106 measures responding to the recently adopted Council SPG on Planning Obligations, and Policies C.2.1 and IMP.6.1 of the UDP.

New community facilities

6.59 The new community centre at Tigar Hall will provide 241sq.m of accommodation. This facility is being provided in direct response to the current

deficiencies in existing facilities and as a result of the public consultation exercise.

6.60 Additionally, Tigar Hall will also house an I.T. suite and permanent historical exhibition. The site management office will also be housed here.

6.61 The facility will assist in increasing social interaction, integration and cohesion and accords with PPS1 which states that 'the Government is committed to... promoting community cohesion...personal well-being, social cohesion and inclusion'. It will also increase accessibility to community facilities in accordance with PPS1, Objective 2 and 4 and Policy 3A.18 of the London Plan; and Policy IMP.6.1 of the UDP.

Crime and Public Safety

6.62 The secure basement car park will be monitored by CCTV. Furthermore, the Crime Prevention Design Advisor has been consulted and discussions are on-going.

6.63 This is in accordance with PPS1 which aims to deliver safe places to live and Objective 2 of the London Plan which states that consideration should be given to improving security, crime prevention measures and integrated management of the neighbourhood to improve personal safety'.

DESIGN

6.64 The scheme has been designed by John Thompson & Partners having regard to the context of the area, the height, scale and design of surrounding buildings and the setting of Campion House itself. The architects have prepared a Design & Access Statement which should be read in tandem with this planning report. A separate Design and Access Statement relating to Campion House and Tigar Hall form part of the Conservation Area Statement.

- 6.65 There is increasing recognition of the importance of good quality design in developments as a planning consideration which has been set out in policy documents at national, regional and local levels. The appearance of new buildings has a higher profile in the community and in this case has been identified as a key criterion in defining the design parameters for the Campion House site.
- 6.66 The design team have worked together with the Council and residents to develop parameters for redevelopment which meet aspirations and take into account the views of stakeholders. In design terms, other than the locally listed building and Tigar Hall the existing buildings are considered to make little contribution to the character of the wider area.
- 6.67 PPS1 seeks to ensure the achievement of high quality and inclusive design including buildings, public and private spaces. It states that new housing 'should be well-designed and make a significant contribution to promoting urban renaissance and improving the quality of life' (paragraph 33).
- 6.68 Paragraph 34 of PPS1 requires that good design contributes to making places better for people, and that design which inappropriate in its context or fails to take the opportunities available for improving the character and quality of an area and the way it functions should not be accepted.
- 6.69 In addition, PPS3 acknowledges the importance of good design in securing high quality housing and the necessity to promote designs and layouts which make efficient and effective use of land, helping to create sustainable residential environments.
- 6.70 PPS3 details several aspects for consideration when assessing design quality. These include the extent to which the development is accessible and well-connected to public transport, community facilities and other services and the extent to which the development is well laid out so that all the space is used efficiently, is safe, accessible and user-friendly. In addition, access to community, green and open amenity and recreational spaces (including play

space) as well as private outdoor space such as residential gardens, patios and balconies should be available.

- 6.71 PPS3 suggests developments should integrate with the neighbouring buildings and the local area in terms of scale, density, layout and access, and promotes a design-led approach to the provision of car-parking space, with a high quality public realm and streets that are pedestrian, cycle and vehicle friendly. A further consideration is whether a proposal creates or enhances a distinctive character which complements the surroundings and helps support a sense of local pride and identity.
- 6.72 Paragraph 48 states that *'good design is fundamental to using land efficiently. LPA's should facilitate good design by identifying the distinctive features that define the character of a particular local area'*. The proposal accords with this by maximising the benefit of the open space and fully connecting this with the public realm, whilst maximising density at a level that respects the existing character and appearance of the area.
- 6.73 Reflecting PPS1 and PPS3, The London Plan sets out the design principles for a compact city in Policy 4B.1 and makes clear the need for developments to maximise the potential of the site, enhance the public realm, be practical and legible, respect local context, character and communities, and to be attractive to look at, and where appropriate, to inspire, excite and delight.
- 6.74 The LPA outlines its objective to ensure that all new development will be in keeping with, or enhance, the local character of established areas of townscape in the UDP.
- 6.75 The design objectives for the redevelopment of the Campion House site are shown within the Design and Access Statement as:
- The retention of existing buildings of quality
 - Recognising the existing patterns and types of development
 - Proposing a variety of accommodation

- Responding to the character of the area
- The provision of quality open space
- Minimising the impact of vehicles
- The provision of new community facilities
- Sustainable development

6.76 In terms of use, as described within the Land Use section of this statement, the provision of primarily residential accommodation suits the character of the conservation area, whilst also responding to the acknowledged need for housing in the area. The use of the land also includes publicly accessible open space, private amenity space and a community/management facility.

6.77 In relation to amount, a total of 168 units are proposed. This will comprise 127 apartments, 25 dwelling houses and 16 maisonettes. The apartments will be distributed across the site in four villa blocks along the eastern side of the site with two further blocks towards the centre of the site. The maisonettes are arranged in two terraces at the south-western quarter of the site, encircled by the private dwelling houses in four terraces and a pair of semi-detached houses.

6.78 The amount of open space will comprise 1.45ha of publicly accessible space and residents playspace, 0.27ha private amenity space, 0.62ha shared amenity space, 0.14ha incidental space and 0.29ha circulation space.

6.79 In terms of layout, the proposed scheme has been divided into a number of distinct character areas which include:

- Converted buildings in an enhanced setting
- Formal villa blocks
- Public space to Thornbury Road
- A pedestrian extension of Church Road
- Contemporary apartment blocks
- Contemporary housing

- Residents gardens
- Landscaped public areas

- 6.80 The formation of these areas allows for the creation of key spaces whilst also allowing areas of the site that were inaccessible and screened from view to be opened up for public access, creating strong visual and pedestrian connections. This provides a clear hierarchy of spaces with primary landscaped open space representing the public areas, and secondary landscaped open space the semi-private areas for residents.
- 6.81 A clear distinction has also been made between pedestrian and vehicular routes on the site, with pedestrians given priority thereby creating a safe environment and ensuring that the proposed landscape setting of the development is not compromised by the presence of vehicles. Vehicular routes only have access to a small proportion of the site, asserting the primacy of the pedestrian further emphasised through the selection of road surfacing materials such as shared surface treatment in key locations.
- 6.82 A clear hierarchy between routes is established with the primary pedestrian network providing access between the public main spaces, with secondary routes giving access to more intimate spaces around buildings. Conversely, the only primary vehicular access to the site is located at the far south-eastern corner, well away from the public areas.
- 6.83 In terms of the scale, form and massing of the new buildings, this has been informed by the historical character of the site and surroundings which consists of residential development of two, three and four storeys. In addition, all new buildings respond and are subservient to Campion House in terms of location, height, massing and materials, with none of the proposed buildings exceeding its ridge height.
- 6.84 At the site boundaries, the proposed buildings respect the heights of adjacent properties and gradually step up in height towards the centre of the site.

- 6.85 In terms of the articulation of the facades, the residential nature of the proposed buildings engender a human scale. There are no sheer blank walls with everything broken down into small parts, avoiding the monolithic character of existing development on the site.
- 6.86 In relation to appearance, the materials chosen complement existing buildings within the locale and comprise high quality and durable materials with extensive facing brickwork. Stone dressing to window openings and a through coloured render system are also proposed, echoing the original Davies development. Areas of timber cladding to reflect later development in the area will also be used, whilst roof materials will comprise slate or reconstituted slate to pitched roofs.
- 6.87 These issues are addressed in more detail within the Design and Access statements prepared by John Thompson & Partners which accompanies this application.
- 6.88 The proposal therefore accords with the policies outlined above and within PPS1; PPS3; PPG15; London Plan policies within Section 4B, in particular 4B.1 and 4B.3; and ENV.B.1.1, 2.2, 2.6, 2.7 of the UDP.

Conservation Issues

- 6.89 A Conservation Area Statement has been prepared by John Thompson & Partners and should be read in conjunction with this statement.
- 6.90 The statement seeks to demonstrate how the redevelopment proposals will preserve and enhance the character and appearance of the conservation area; how the conversion of Campion House and Tigar Hall will preserve and enhance the architectural and historic interest of the building; and that the remaining existing buildings, whilst pleasant and of some historic interest, are not so significant as to warrant their retention.

6.91 Having assessed the contribution made by each building, it concludes that the proposed development enhances the character and appearance of the conservation area and Campion House, and that:

- None of the buildings proposed for demolition are considered to make a positive contribution to the conservation area;
- The proposals restore the original residential use of Campion House and return it to its nineteenth century detached character;
- The new development is an imaginative, high quality design, which has regard for the scale, height, form, massing and materials of existing buildings within the area surrounding the site;
- The new scheme provides publicly accessible open space to the rear, increasing the recreational space available to the local community.

6.92 The proposal therefore accords with London Plan Policies 4B.10 and 4B.11; PPG15; and UDP policies ENV.B.1.1, B.2.2, 2.3, 2.6, and 2.7.

Landscape and open space

6.93 In design terms, the proposal provides a high quality environment, fully integrating landscape and open space design.

6.94 In quantitative terms a minimum of 1ha, in accordance with the appeal Inspector's recommendations, of publicly accessible space would be provided where currently no local publicly accessible space is available.

6.95 In relation to the play area, the scale and nature of the provision to be made has had regard to the character of the proposed development, the surrounding area and the nature of the prospective occupants. Reference has been made to the UDP standards and the Mayor's SPG on Play and Informal Recreation.

6.96 PPS3 highlights the importance of ensuring that the needs of children are taken into account in developments where family housing is proposed. The proposal encapsulates the guidance contained within Paragraph 17 which advises that there needs to be good provision of recreational areas, including private

gardens, play areas and informal play space which should be well designed, safe and secure areas with pedestrian access.

- 6.97 In comparison to the existing situation, the demolition of the majority of existing buildings and extensions, and the provision of publicly accessible open space is considered to improve the character and appearance of the conservation area. The proposal therefore supports PPS3; The Mayor's SPG on Play and Informal Recreation; London Plan Policy 3A17; 3D.8; 3D.12; 3D.13; Policy ENV-N.1.10 and N.1.11 of the UDP.

Trees

- 6.98 The Design and Access Statement includes a landscape strategy by Neil Tully Associates and incorporates a tree survey. The survey identifies all the trees within the site and classifies them in terms of their health, amenity value and likely long-term retention.
- 6.99 The overall strategy with regard to trees is to preserve good quality trees and ensure their retention during construction wherever possible, together with substantial new planting to define and enhance the area. The landscape masterplan shows that many of the existing trees are to be retained and a major re-planting programme to accompany the redevelopment will be undertaken, which will be planned to assist in establishing character areas and encourage biodiversity. The strategy for re-planting is to plant trees of appropriate heights to provide a sense of identity to each of the character areas.
- 6.100 This again enhances the character and appearance of the Conservation Area, and supports Policy 3D.15 of the London Plan; and Policies ENV.N.2.6, 2.7 and 2.8 of the UDP.

Designing Out Crime

- 6.101 PPS1 attaches weight to designing out crime. Accordingly, UDP policies relevant to crime prevention include ENV.B.1.9 within the UDP which shares the approach taken in the London Plan at Objective 2, Policy 4B.1 and Policy 4B.6 seeking

safe, secure and appropriate accessible environments. The Crime Prevention Design Adviser has been consulted as part of the stakeholder consultation exercise which has informed design development, and discussions are ongoing.

- 6.102 The proposed layout seeks to maximise the natural surveillance of paths and public spaces and provides maximum opportunities to ensure that people are overlooked in the public realm. The layout and orientation of buildings assist in ensuring that the buildings are outward facing, and look out to the public domain from their front facades. Entrances and windows at ground floor will assist in maximising natural surveillance, and no blank walls are proposed.
- 6.103 The proposed layout also ensures that the areas surrounding the buildings will be clearly defined to assist the principle of defensible space. The layout will allow clear separation between public areas, and semi-private residents' gardens and private garden spaces.
- 6.104 The secure basement car park will be monitored by CCTV. As a further crime prevention measure, it is anticipated that the publically accessible areas of open space will be closed between dusk and dawn.
- 6.105 The scheme therefore accords with PPS1; London Plan policies 4B.1 and 4B.6; and UDP Policy ENV.B.1.9 and T.2.2.

Amenity

- 6.106 The design of the development provides good natural light for all new dwellings, whilst minimising overlooking and overshadowing between them. As outlined within the Sustainability Appraisal accompanying this application, the housing has been positioned to maximise benefits from sunlight and allow maximum penetration into the dwellings and amenity spaces. The Appraisal states that each house/maisonette will have at least one primary façade that benefits from a southern aspect.
- 6.107 The proposed redevelopment has minimal impact upon existing properties in terms of privacy, light and enclosure.

- 6.108 In terms of privacy, The Council guidelines indicate that there should be a minimum of 21m between habitable rooms facing one another. The proposals are generally set in sufficient space and reflect the prevailing character of the area and consequently there are no issues of overlooking in relation to habitable rooms in relation to both proposed and existing dwellings, and between proposed dwellings themselves.
- 6.109 Where exceptionally the 21m guideline is breached, this is between new build blocks. There are three areas of the site that have been designed as pedestrian or pedestrian-priority 'streets'. To ensure an urban design of suitable character and density the width of these new 'streets' has been carefully considered to ensure suitable enclosure, definition and natural surveillance, avoiding a suburban feel to the heart of the proposed development.
- 6.110 The main pedestrian route into the site (Church Walk) is faced by apartment blocks (Blocks C and D) and terraced housing (Block Hi) and varies in width between 11 metres at its narrowest point and 25 metres at its widest. The scale and configuration of this route is one of the fundamental qualities of the proposal. The other two 'streets' vary between 13 and 16 metres in width, where faced on both sides by habitable rooms of apartment blocks and terraced housing. These both run in an approximate north-south direction (between Blocks E/F/G and Block H, and between Block H and Block J) and are both pedestrian priority routes.
- 6.111 The scheme is envisaged as a sustainable form of development that creates a new urban grain, forms enclosure and definition, and connects strongly to broader open spaces within the development site.
- 6.112 In relation to the north of the site, the rear section of the proposed Block A is level with the rear building line of Campion House addressing issues in relation to privacy to Thornbury Avenue properties. This reflects the existing layout of development.
- 6.113 There is no issue in relation to the east of the site in relation to properties across Thornbury Road, nor to the west at the Gymkhana club.

- 6.114 In relation to the south of the site there would be approximately 10m distance from the nearest gable wall on the Kilberry Close properties from the southernmost elevation of Blocks Hiv and Jiii. The windows on the flank elevation at Kilberry Close which fall within 21m are non-habitable rooms.
- 6.115 The scheme therefore accords with UDP Policy ENV.B.1.1.
- 6.116 With regard to overshadowing and light conditions, Mike Sindic has prepared a report which states that the scheme is BRE compliant. This is examined within the Environmental Impact chapter in more detail.

TRANSPORT AND INFRASTRUCTURE

- 6.117 This section summarises the proposed transport improvements and assesses their compliance with national, regional and local planning policy and guidance. It should be noted that there were no objections by the Council or the Inspector on transport issues in relation to the earlier planning application for 239 units.
- 6.118 All transport related matters are addressed in more detail in the Transport Assessment (TA) prepared by T A Millard which accompanies this application and is in accordance with PPG13. This covers issues relating to trip generation, accessibility, junction assessments and parking demand. We set out below an outline of the principal conclusions, in particular those relating to car parking according with policy standards.
- 6.119 The TA has shown that traffic growth 'with development' would be minimal, with AM and PM peak traffic volumes likely to increase by approximately 2-8%. Following an assessment of the main junctions, it is concluded that improved junction design at the Great West Road and Thornbury Road will improve the capacity of the junction.
- 6.120 The site has good access to the London Underground network via Osterley which is within 10 minutes walk. The station is served by the Piccadilly line with access to Central London, the West End and Heathrow airport.

- 6.121 The site is also served by buses. The H28 service stops adjacent to the site, whilst the H91 service on the Great West Road stops some 3 minutes walk from the centre of the site.
- 6.122 In relation to transport improvements, a package of measures to include the junction improvement outlined can be secured by way of a S106.
- 6.123 In relation to the internal configuration of the site, this follows an approach whereby pedestrians and cyclists are considered first, followed by service vehicles and finally private motor vehicles which accords with objectives of the Mayors Transport Strategy for London.
- 6.124 Residents will have accessibility to non-transport modes which will reduce the use of private motor vehicles for some journeys. Through limiting vehicle trips, this development aims to reduce its impact on the road network and congestion levels in order to minimise its impact on the environment.
- 6.125 Limiting car parking will be a major influence in encouraging people to use public transport to access and travel within the site, which is outlined in PPG13 (2001). As stated within this: *'Reducing the amount of parking in new development is essential, as part of a package of planning and travel choices'*. This is echoed in London Plan Policy 3C.23 which seeks that there is no over provision of on-site car parking.
- 6.126 The Council's adopted car parking standards at Appendix 3 would require a maximum of 193 parking spaces for the proposed mix of residential accommodation, which falls within the range of 172-207 demand for spaces based on Census data outlined in the TA.
- 6.127 The provision of spaces is therefore compliant with the TA and is considered acceptable. As such, the parking provision is provided at an average of 1.1 parking spaces per dwelling. This accords with the standards set out in Annex 4 of the London Plan and the UDP standards, which seeks a maximum of 1.5 spaces per dwelling.

- 6.128 In relation to disabled parking the 13 spaces provided exceeds the Council's policy of 6% of visitors parking. This includes 6 spaces at surface level (16% of surface parking spaces) and 7 spaces at basement level (6% of basement spaces). The provision of 7% of total parking provision thereby complies with Policy 3C.23 (Parking Strategy) of the London Plan which suggests that the parking requirements of disabled people should be recognised, and T.1.4 of the UDP.
- 6.129 A large proportion of the parking (111 spaces or approximately 58%) will be basement in nature, and be designed in accordance with best practice, with the aim to move away from parking dominating public spaces of the site in order to ensure the proposed landscape setting of the development is not compromised. This will also contribute to the efficient use of land. 48 spaces will be integral garage parking serving the townhouses, with 36 surface car parking spaces located in remote areas, well away from the public open space.
- 6.130 In relation to Tigar Hall, the Council's standards suggest 1 space per 5 patrons for community centres. Since the drawings highlight that 10 terminals are to be located within the IT suite, and it is envisaged that the majority of those visiting will do so on foot, the 2 spaces proposed are adequate.
- 6.131 Secure areas for storage of bicycles and motorcycles will be provided as part of the proposal. They will be located at basement or ground floor areas for the flatted element of the scheme and are proposed using the minimum standards set out by TfL for residential development at 1 space per unit. It is hoped that good quality cycle parking will promote greater cycle use which complies with PPG13, and 3C.22 of the London Plan seeking to improve conditions for cycling.
- 6.132 In terms of delivery/servicing and emergency vehicle access, the scheme has been designed to ensure such movements are taken into account. Parking and loading controls will be necessary, and late night and early morning deliveries not permitted. 'Church Walk' will be designed to serve as an alternative entrance for emergency vehicles should the main entrance be blocked.

6.133 In relation to visibility, the TA states that both the main access and secondary access serving Campion House are in excess of 70m x 2.4m to the north and south which is in accordance with the Design Manual for Roads and Bridges and greater than that required in Manual for Streets.

6.134 A Travel Plan has also been prepared by T A Millard to encourage more sustainable modes of transport. This will be co-ordinated by the management company. It is hoped that the proposed measures will achieve a 10% reduction in traffic generation, with subsequent benefits to air quality.

6.135 For the above reasons the proposal will be consistent with PPG13, Policy 3C.1, 3C.2, 3C.22 and 3C.23 in the London Plan, and T.1.2, 1.4, 2.1, 2.2, 4.3 and 4.6 in the UDP.

ENVIRONMENTAL IMPACT

6.136 A Sustainability Appraisal accompanies this application, to accord with Policy ENV.P.1.1.

Air Quality

6.137 The entire borough has been declared an Air Quality Management Area. However, since the number of units is lower than previously proposed any impact can be mitigated by appropriate S106 contributions relating to air quality, as confirmed by the Council's Environmental Strategy Officer. The Air Quality Assessment forms part of the Sustainability Checklist.

6.138 Demolition, soil remediation, earthworks and movement of construction vehicles have the potential to result in significant temporary construction dust impacts. The incorporation of effective site management procedures and mitigation measures will ensure the impact of the construction works at the nearest residential properties is minimised. This can be conditioned to conform to the London Best Practice Guide: The Control of Dust and Emissions from Construction and Demolition.

- 6.139 For the above-mentioned reasons, the proposal will be consistent with PPS23, Policy 4A.19 of the London Plan and Policy ENV.1.6 of the UDP.

Noise

- 6.140 An Environmental Noise Assessment has been prepared by noise.co.uk and should be read in conjunction with this statement. It highlights that the site lies within NEC B for daytime and NEC C at night time, and concludes that it will be possible to meet all internal noise standards using noise mitigation measures using glazing and acoustic ventilators. An appropriate condition can be attached to any permission to meet required standards.
- 6.141 Given that the proposed development seeks to replace accommodation previously used as living quarters, it is expected that the proposals would be acceptable as adequate noise mitigation measures will be implemented, improving the situation. It therefore accords with London Plan Policy 4A.20 and ENV.P.1.5 of the UDP.

Waste

- 6.142 A refuse and recycling strategy forms part of the Design and Access Statement which refers to the provision and collection of refuse, and highlights the location of the proposed bin stores. This has been prepared in consultation with the Local Authority Refuse Department. Recycling is also discussed in the Sustainability Appraisal.
- 6.143 The proposed service road allows for easy collection for refuse and recycling with minimal disturbance. In addition, the applicant is prepared to cover the cost of the recycling bins.
- 6.144 Design measures will ensure that residents have access to waste management and recycling facilities. The segregation and storage facilities will be conveniently located so as to encourage residents to recycle. As such, the proposal will be consistent with PPS10, Policy 4A.21 of the London Plan, and ENV.P.2.1 and 2.4 of the UDP.

Water

- 6.145 A Flood Risk Assessment (FRA) has been prepared by Glanville Consultants, whilst Thames Water have prepared a Clean Water Flow and Pressure Investigation Report. This forms part of the Sustainability Checklist and should be read in conjunction with this report.
- 6.146 The FRA highlights that the proposed surface water drainage system can be designed as to not adversely affect the local drainage network or adjacent properties. Sustainable drainage techniques would restrict the existing discharge rate by 75%. The proposed development will therefore reduce the flow to the public surface water sewer and therefore reducing the risk of flooding off-site.
- 6.147 The proposal would also include active management of surface run off through the storage of surface water which is proposed to be increased by 30%. Whilst permanent open water features should not be incorporated within the SUDS design, in order to accord with the Civil Aviation Advice Note 3, alternative forms of SUDS including the use of porous paving and dry swales are proposed. As outlined within the Sustainability Appraisal, and to attenuate surface water run-off, an area of reed beds is proposed between Blocks H and J.
- 6.148 The Thames Water report highlights that the water supply network has sufficient capacity to meet new peak demand and recommends that the proposed flats incorporate water storage and boosted systems to ensure adequate supply to upper floors with the added benefit of minimising any further reduction in existing pressure.
- 6.149 In relation to foul water, Thames Water had previously raised no objections to the scheme for a greater number of units. In addition, the Environment Agency had no objection to the earlier scheme subject to the imposition of a condition requiring surface water control measures.
- 6.150 Therefore, the proposal will be in accordance with PPS25, Policy 4A.14 and 4A.18 of the London Plan which present policies relating to the water environment, and UDP Policies ENV.P.1.3 and 1.4.

Contamination

- 6.151 A summary Desk Study and Interpretative Site Investigation Report has been prepared by T&P Regeneration and should be read in conjunction with this report.
- 6.152 It forms part of the Sustainability Checklist accompanying this application, and indicates that there are small, localised areas of contaminated land within the site. These would be removed prior to occupation, and suitably validated to confirm with the requirements of the Environment Agency, the Council's Environmental Health Officer and the NHBC. The report also highlights that additional investigation is recommended post demolition at the areas of heating oil storage and the electricity sub-station, and that if any anomalous material is uncovered further measures can be taken. This can be subject to an appropriate condition.
- 6.153 The mitigation measures proposed will ensure that the proposal is consistent with PPS10, PPS23, and Policy 4A.33 in the London Plan.

Ecology and Nature Conservation

- 6.154 The ecological impacts that may result as a consequence of the development area assessed in the Ecological Assessment by ECOSA.
- 6.155 This highlights that there is no evidence of great crested newts, reptiles or badgers. There is evidence of limited bat activity and appropriate mitigation measures can be put into place. Additional survey work is currently being undertaken to accord with the respective timeframes for undertaking such work in relation to newts and bats.
- 6.156 The survey also raises the presence of stag beetles. This had not been highlighted in previous assessments since they were Phase I protected species surveys. The current report is a Phase II approach which has focused on additional species.

6.157 Appropriate conditions could be imposed on any planning permission granted and/or obligations secured requiring further survey work, should this be considered necessary.

6.158 The scheme therefore accords with Policy 3D.14 of the London Plan, and Policies ENV.N.2.3, 2.3A, 2.4 and 2.5 of the UDP.

Daylight/Sunlight

6.159 A daylight and sunlight report has been prepared by Mike Sindic, which gives consideration to residential property neighbouring and facing the site and between the site itself, which should be read in conjunction with this report.

6.160 It states that the scheme is BRE compliant in terms of both daylight and sunlight. There is a small breach to four windows at No.114 Thornbury Road, adjacent to the proposed Block A at the north of the site, but three of which serve non-habitable rooms. The fourth window serves a habitable room, but this room is served by a rear (west) facing window and is therefore not a concern. Furthermore, since the BRE standards indicate that the numerical values are advisory and guidelines provided flexibly, it is considered the impact on the one window in light of the proposed scale of development is acceptable.

6.161 In relation to the impact on daylight/sunlight within the proposal itself, the report highlights that the proposed development will be fully BRE compliant.

6.162 The proposal therefore complies with BRE guidelines, Section 4 of the UDP SPG, and Policy ENV.B.1.1.

Wind

6.163 The impact of wind, the baseline conditions, the potential direct and indirect impacts arising and the mitigation are assessed in the Wind Microclimate Desk Study produced by RWDI Anemos.

- 6.164 The purpose of the assessment is to assess the likely impact of the proposed development on the comfort and safety of pedestrians from wind.
- 6.165 A desk-based assessment was undertaken and the building massing reviewed to consider the way in which wind blows around the site. The results were quantified in terms of the Lawson Comfort Criteria.
- 6.166 The assessment found that no mitigation measures are required. The positioning of landscaping around the site is expected to have favourable impacts on wind conditions.

Sustainability

- 6.167 A Sustainability Checklist has been prepared by CgMs and incorporates various other consultants' reports within the appendices. This is a standalone document describing how sustainability considerations have influenced the proposals and how sustainable design and construction measures will be implemented, reflecting the requirements of London Plan Policy 4A.3.
- 6.168 The scheme allows for the re-use of 2 existing buildings and the development of previously developed land. In addition, the affordable homes will achieve a Code 3 rating of the Code of Sustainable Homes.
- 6.169 Energy efficiency measures will be adopted, which include high levels of thermal insulation, efficient light fittings, passive design and efficient white goods specification.
- 6.170 An energy assessment has been prepared by Spencer Mayes to accord with former London Plan Policy 4A.4. On-site renewable sources will provide a minimum of 10% of the proposals energy requirements. Compliance with the updated London Plan policy (4A.7) and its increased requirements will be addressed during the course of the application, having regard to the schemes feasibility. This is proposed via solar hot water systems with either ground source heat pumps or biomass CHP.

- 6.171 In terms of building materials, the scheme will be constructed using timber which will be sourced from managed and sustainable sources. In relation to secondary materials, these will be sourced from the Green Guide (2007). Recycled and reclaimed materials will also be used in construction where possible, including the use of demolition materials as hard-core in construction of groundworks elements. More details can be found within Section 4.18 of the Design and Access Statement.
- 6.172 A water conservation strategy has been developed for the site, which focuses on reducing water demand through design. Water consumption will be reduced through the specification of low consumption sanitary fittings, such as dual flush toilets, reduced flow showers and flow regulated taps.
- 6.173 Sustainable Urban Drainage Systems were considered but due to the proximity of the site to Heathrow Airport and in order to accord with BAA Advice Note 3 only a small permanently wet water feature is included, whilst green roofs will be restricted to the bin/cycle stores on the scheme. This is addressed within the section of Water within this statement.
- 6.174 Whilst the proposal will result in the loss of some vegetation and trees, a comprehensive landscape proposal will replace and provide additional planting including the provision of an area of meadow planting which will substantially improve the nature conservation value of the site. Details are contained within the landscaping section of the Design and Access Statement and within the Tree and Open Space section of this statement.
- 6.175 As already outlined, the proposal will also provide recycling facilities.
- 6.176 The proposal will be consistent with PPS22, Policies 4A.1; 4A.3; 4A.4; 4A.7; and 4A.16 of the London Plan, and ENV.B.1.1 of the UDP.

Access

- 6.177 A Design & Access Statement has been prepared by the architects, John Thompson & Partners, and this should be read in tandem with this statement.

6.178 This highlights that the applicant meets the standards in Part M of the Building Regulations. Indeed, all new build units are wheelchair accessible (i.e. a wheelchair user will be able to access each unit) and are also designed to meet the criteria of Lifetime Homes. The parking spaces for disabled drivers are highlighted on the relevant drawings, and the proposed units are located in close proximity to these spaces.

6.179 To summarise, the scheme in relation to the new build houses and flats, will provide entrances that are level which do not require ramps (other than the converted Campion House where a raised ground floor makes level access impossible, although a purpose built temporary ramp that is stored within the building will allow disabled access when necessary); entrances and access areas that are free of obstructions; doorway and corridor widths which allow access by wheelchair users; lifts providing access to all levels of the new apartment blocks other than Block G, the converted Campion House, the three and four bedroom houses and the maisonettes; lighting and floor finishes designed for easy navigation; communal stairs designed for ambulant disabled use; and amenity space that is wheelchair accessible. It is not considered viable to include lifts within the three and four bedroom houses and maisonette units, and consequently these are not wheelchair accessible to all floors within these units. Full disabled access will also be available to Tigar Hall.

6.180 Access within the open space has been addressed within the Design and Access statements. To summarise:

- Circulation within the site has been carefully designed in order to promote a pedestrian-priority layout, allowing the garden areas to become spaces for the immediate community and to avoid a car-dominated environment.
- Externally levels will be carefully designed to avoid steps, steep gradients and obstructions that could hinder movement
- A pedestrian network will be provided within the site. This will provide footpath links between the residences and the open spaces.

- 6.181 This ensures that the scheme complies with Policy 3A.17 and 4B.5 of the London Plan, and Policies ENV B.1.1 and H.4.1.

Community Infrastructure

- 6.182 The proposed scheme will include an on-site office within Tigar Hall for management staff to, among other things, monitor the dedicated disabled parking spaces and on-site parking generally, monitor refuse and recycling collection, and co-ordinate travel as part of the green travel plan.
- 6.183 It is acknowledged that the proposal may require contributions to education places, health provision and highway improvements. Linden Homes have no objection in principle to the making of contributions to such facilities where compliant with the guidance in Circular 05/2005.
- 6.184 In addition, both the publicly accessible element of the open space including its layout and ongoing maintenance, and the provision of affordable housing as discussed above, will also be subject to a Section 106 agreement. The final levels of contributions and affordable housing may vary subject to the levels sought of each by the Council. The viability evidence submitted to the Council demonstrates that if 37.5% affordable housing is provided, a maximum of £1million can be generated to fund planning obligations.
- 6.185 The proposal therefore accords with Policy 3A.18, 6A.4 and 6A.5 of the London Plan and Policy IMP.6.1 of the UDP.

Consultation

- 6.186 Section 3.1 of the Design and Access Statement prepared by John Thompson & Partners outlines the extensive additional consultation undertaken with local residents and members of the Council prior to the submission of the application. It should be read in conjunction with this report. The consultation accords with the aims of PPS1 which states that 'community involvement is an essential element in delivering sustainable development and creating sustainable and safe communities'.

- 6.187 Following a series of pre-meetings with key local stakeholders, a Community Planning Day was held on 20 October 2007 with 47 local people attending. Matters discussed included existing problems, aspirations for the site and how they could be achieved. Key issues raised included constraints; landscape; heritage; transport and site layout.
- 6.188 A Report Back event was held on 31 October 2007 at which a Report Back paper was distributed, followed by a Community Forum event on 27 November at which the developed proposals were presented and a lengthy question and answer session held.
- 6.189 A Community Exhibition of the draft proposals was held on 31 January at which questions were answered and feedback forms provided and collected.
- 6.190 A series of smaller meetings with the local resident's action group, Campion Concerns, have been undertaken in addition to the public events.

7.0 CONCLUSION

7.1 We conclude that the proposal:

- provides a sustainable form of development utilising previously developed land, enhancing biodiversity and incorporating a range of measures to conserve energy and water. Based on the parameters set by the Appeal Inspector It is at an appropriate density which respects the site and surroundings and accords with the principles of guidance at a National level and the London Plan;
- has been well designed to restore the existing villa building through the demolition of its extensions, restore the existing Tigar Hall, whilst also demolishing buildings which do not contribute to the character and appearance of the conservation area and replace them with high quality buildings which reflect the most valuable elements of the existing character and appearance of the area. These aspects would preserve and enhance the character and appearance of the Conservation Area;
- allows for the release of private land into public use, providing publicly accessible open space and local facilities in an area where they are currently deemed to be deficient. It will provide a variety of planting which will enhance local ecology and in addition will accommodate an equipped play area, and formal communal gardens including a new open space on a prominent road frontage within the conservation area. It will also seek to retain the most important existing mature trees, in particular the two cedars fronting the site, and supplement them with further planting throughout the site;
- provides sufficient parking to ensure adequate space is available for future residents without encroachment onto neighbouring roads. The main parking area has been located at basement level to enhance the appearance of the scheme and its visual impact on the surroundings, and ensure efficient use of land;

- would contribute to the Boroughs' housing needs by providing an appropriate mix of dwelling sizes from 1 bedroom flats to 4 bedroom houses. Furthermore, it would also provide 63 affordable homes also at a variety of dwelling sizes which includes 44 social rented and 19 intermediate homes, making a significant contribution to the targets in the Mayor's Draft Housing Strategy;
- has taken into consideration the opinions of local residents and stakeholders through consultation and these views have contributed significantly to the form of the current scheme.
- is smaller in scale than previous application schemes, limiting the amount of affordable housing and other planning obligations it can support. The evidence on Economic Viability and Affordable Housing Provision submitted to the Council examines the development economics of the proposal and indicates that the scheme can provide a maximum reasonable proportion of 37.5% affordable housing, and that a greater proportion of affordable housing sought would reduce the level of contributions available, and vice versa.

7.2 The proposed development is therefore consistent with planning policies and should be supported by the Council.

APPENDIX A – OPEN SPACE APPRAISAL

Although national planning guidance on open space is primarily set out in PPG17, the Government's position on delivering housing objectives is principally set out within PPS3, which supercedes PPG3.

Paragraph 36 of PPS3 states that the priority for development should be previously developed land, which is defined in Annex B as that which is or was occupied by a permanent structure, including the curtilage of the developed land and any associated fixed surface infrastructure. It excludes, among other things, land in built-up areas such as parks, recreation grounds and allotments which have not been previously developed. The Campion House site is not a primary open land use site of this kind since it does not fall within these categories.

The guidance in PPS3 echoes and summarises the definition of previously developed land previously found in PPG3 Annex C, which expands on the definition within a footnote. It stated that where the footprint of a building only occupies a proportion of a site of which the remainder is open land (e.g. a hospital), the whole site should not normally be developed to the boundary of the curtilage. It went on to state that the LPA should make a judgement about site layout in this context bearing in mind other planning considerations such as policies for the protection of open space. This guidance is relevant to the Campion House site, which comprises the buildings and gardens/grounds of a redundant seminary.

Policy guidance therefore encourages development on previously developed land such as that at Campion House, subject to considerations which in this case include the Local Open Space designation of part of the site.

The boundary of the Local Open Space designation has been drawn tightly round the backs of the existing buildings on the UDP proposals map. In our view it should not however act as a rigid constraint on the proper replanning of the site. If this was the case, development would be severely restricted to the frontage of the site. Unless the level of development on this portion was substantial in terms of scale, with repercussions in terms of the impact on the surrounding setting, including a mainly continuous frontage located relatively close to Thornbury Road greater than that provided by the existing

buildings, the site's potential would not be maximised - nor would the density of the proposal be at a level which accords with current guidance as defined in the appeal Inspector's report.

In this regard, for the purposes of density calculation, the developable site area has been established as not including 1ha of publicly open space with the net residential area being a maximum of 2.6 ha, (or 2.2 ha if the site area of 104 Thornbury Road is excluded, having been sold since the previous application).

It will also be necessary to address policy requirements at all levels to provide a mix of housing types including houses and flats. This is in order to accord with PPS3, the Mayor's Draft Housing Strategy and London Plan Policy 3A.5, which seeks to ensure that new developments offer a range of housing choices in terms of the mix of housing sizes and types.

Consequently, in order to maximise the potential of the previously developed site, provide an appropriate mix of housing types, whilst also making available adequate amenity open space, the approach has been to distribute part of the development onto part of the curtilage land. In doing so, the scheme seeks to strike a balance between an appropriate mix of residential dwelling types serving a range of needs, supported by community uses in the form of a community building and open land provision.

PPG17 refers to developments within open spaces, and that in considering planning applications local authorities should weigh any benefits being offered to the community against the loss of open space that will occur.

In this regard, the Annex to PPG17 states that areas of open space can perform multiple functions. A comparative list of these functions in relation to the existing and proposed situation is highlighted in the table below.

Function listed within PPG17	Existing situation	Proposed situation
Strategic functions – defining and separating urban areas and providing for recreational needs over a wider area	A local gap is provided, but due to no public access it does not provide for recreational needs over a wider area.	Redevelopment would retain a local gap but also provide recreational facilities for the wider area.
Urban quality – helping to support regeneration and improving quality of life for communities by providing visually attractive green spaces close to where people live	The existing arrangement does not support regeneration, improve quality of life or provide visually attractive green spaces.	Redevelopment under the submitted proposals would achieve regeneration of the site and provide green spaces for the local community thereby improving quality of life.
Promoting health and well-being – providing opportunities to people of all ages for informal recreation, or to walk, cycle or ride within parks and open space or along paths	The land is currently in private ownership and there is no public access.	The release of open space into the public domain will allow for informal recreation, promoting health and well-being – something which is currently not possible.
Havens and habitats for flora and fauna	The current situation provides a very limited range of flora and fauna.	Redevelopment will seek to enhance this with substantial tree planting and landscaping, providing the foundations for a more diverse local ecology and one which people can enjoy through public access.
A community resource – as a place for congregating and for holding community events, religious festivals, fetes and travelling fairs	In terms of use as a community resource, currently this does not occur.	Redevelopment will provide public open space to allow community events if required. In addition, the provision of Tigar Hall as a community facility will enhance this, as will the children's play space. These functions will allow local people to congregate as a community
A visual amenity – even without public access people enjoy having open space near them to provide an outlook, variety in the urban scene, or as a positive element in the landscape	The existing buildings restrict the resource in terms of its visual amenity.	Redevelopment will provide new and enhanced views into the depth of the site from Thornbury Road and create new visual links to/across open spaces as seen from within the site. It will also add variety in the urban scene and act as a positive element in the landscape, by providing an expanse of open space along Thornbury Road itself. Together these changes would significantly enhance the character of the Spring Grove Conservation Area.

The impact of redevelopment and the opening up of this resource to the local community will be significant. This is of course subject to a suitable level of sensitive distribution of built form on part of the designated local open space to achieve the new open space on Thornbury Road and the long range views between new buildings. This matter is discussed in more detail below, which also provides further policy justification.

Whilst the site is not classified as Metropolitan Open Land or Green Belt, the basis for the approach to new development on open land in the London Plan and PPG 2: Green Belts is relevant and states that such development can be:

- appropriate;
- inappropriate; or
- inappropriate, but justified by very special circumstances.

In this regard it is necessary to make a judgment as to how much of the grounds of the former seminary should be developed for housing by having regard to policies to protect open land in urban areas.

The proposed level of encroachment has been assessed using the criteria within the officer's report to committee for the previous scheme, dismissed at appeal for 239 units. The criteria were:

- The level of private amenity space proposed
- The sites location within an area of Publicly Accessible Open Space deficiency
- The quantum and function/s of the new publicly accessible open space
- Contributions towards a Section 106 Agreement to ensure adequate management and maintenance of the Local Open Space in the future

The proposed provision of private amenity space

The UDP Supplementary Planning Guidance indicates that 60sq.m should be provided for each house with four habitable rooms; 75sq.m for each house with five habitable rooms and over; 25sq.m for flats with three habitable rooms and 30sq.m for four habitable

rooms. The guidance states that there should be a clear distinction between the public and private areas.

In order to meet the Council's amenity standards and its play space standards for the proposed development at Campion House some 0.9 - 1.0 ha of open land would be required. In addition, the scheme would provide a minimum of 1ha of publicly accessible open space in accordance with the appeal Inspector's recommendations.

In this regard the revised scheme has sufficient open land provision both to meet the amenity/play space requirements of the scheme itself, and the local open space requirements of 3-4 times the number of dwellings proposed on the site (as assessed by applying the UDP playspace standards).

The site falling in an area of Publicly Accessible Open Space deficiency

As outlined, the site lies within an area of Publicly Accessible Local Open Space Deficiency. Whilst the western part of the site is identified as Local Open Space, significantly it is privately owned and there is no public access. Furthermore, if there were public access to the existing space then the area surrounding the site would not be designated in the UDP as an area that is public open space deficient.

The land is therefore currently of limited value. It has no significant ecological interest, and only very restricted views from the surrounding roads. The proposal will result in the space being clearly visible from Thornbury Road and the visibility of the gardens at the rear of the Campion House building will also be significantly increased through providing enlarged gaps in the built frontage and a reconfiguration to provide more open land on the road frontage. Public access will also be possible to the expanded open landscaped Thornbury Road frontage.

The open space boundary line shown on the UDP Proposals Map has been drawn tightly round the backs of the existing buildings, and should not act as a rigid constraint on the proper re-planning of the site to accommodate its proposed new uses of housing with associated publicly accessible open space.

The Inspector's report on the UDP noted that the Local Open Space policy, which resulted from the combination of all other forms of open space under one designation, is an evolving situation, that further refinement is necessary, and that the policies and text are generally satisfactory, but only as an interim measure pending a full review of the UDP.

The scheme therefore seeks to strike a balance between different planning objectives – providing much needed new housing while for the first time achieving public access to the open land on the western side of the site, creating new strong visual links with Thornbury Road, in combination with the direct provision of more open land on the Thornbury Road frontage itself, that would enhance the character of the Spring Grove Conservation Area.

The implementation of the recently granted scheme at Brunel University's Osterley Campus along with the provision of publicly accessible open space forming part of this development, would provide a significant amount of open space which would contribute to reducing much of the Area of Publicly Accessible Open Space Deficiency.

The quantum and function/s of the new publicly accessible open space

The principal area to form open space is to the west of the site, to the rear of Campion House. This is maintaining and enhancing the existing space. In addition the formation of a series of public and semi-private communal gardens allow the natural environment to penetrate the new areas of housing and provide a new park, linked open spaces and view to the space where they were previously absent.

The proposal seeks limited development to support and encourage more public enjoyment of the open space. The proposed level of designated publicly accessible open and residents playspace is 1.45ha. A further 0.27ha is private amenity space whilst 0.62ha is shared amenity space.

The existing level of designated open space within the site is approximately 2.1ha or 64% of the site area. Any loss will be mitigated by the significant enhancement and improvement of the quality of the open land retained within the scheme as new open spaces, combined with the other benefits set out below.

The new open spaces will be designed to respond more effectively to residents' needs, and the provision of new paths to link the space to the surroundings will provide convenient access to the open space. The proposal will provide formal gardens and a children's play area in area which is currently deficient in publicly accessible open space. These features are compatible with their setting and the surrounding land use and the character and appearance of the conservation area within which it lies.

The proposals include a strategic landscape and planting scheme which describes the approach to landscape and open space in more detail. This will deliver a higher quality open space for residents through parks and public spaces. Importantly the quality will be greatly enhanced when compared with the present, private space. A much closer relationship between existing housing and open space is achieved through integration and as a result high quality open spaces will be attractive to use by a much greater number of people.

PPG17 and its companion guide: Assessing Needs and Opportunities puts much greater emphasis on the accessibility of open space to the population and its quality, rather than simply using a basic formula to calculate need by quantity alone.

The scheme also accords with the objectives of PPG17 which include supporting an urban renaissance, promoting social inclusion and community cohesion, improving health and well being and promoting more sustainable development.

The officer's report in relation to the first scheme indicates that CIP's Regeneration and Development Manager (CIP managing the boroughs parks and open spaces including a portfolio of over 70 pitches) confirmed that he/she did not in principle have an objection to the redevelopment of the site due to a surplus capacity of playing fields within the local area numbering 26 vacant pitches. In addition:

- The size of the current designated local open space at the Campion House site is not based on any quantitative assessment of the amount of play space required to meet local needs.
- The Councils Open Space Study shows there is 5ha of public open space per 1,000 population in the Spring Grove ward and therefore

there is no shortage of general open space. There is a deficiency in small scale accessible public open spaces in the ward providing play facilities which will be met by the scheme.

Willingness to enter into a Section 106 Agreement to ensure adequate management and maintenance of the Local Open Space in the future

A Section 106 Obligation to ensure adequate management and maintenance of the proposed open space areas in the future is also proposed; as is a willingness to contribute a lump sum payment for off site facilities should this be required, in order to enable currently underutilised pitches in the locality to be brought back into active use.

Very Special Circumstances

Development plan policies allow construction of buildings on land designated as local open space in very special circumstances. For the revised scheme these include:

- Achieving an area of open space which provides multiple functions in line with PPG17
- Adequate private amenity space to meet UDP standards
- Provision of local publicly accessible open space in an area with a deficiency of local facilities
- Reconfiguration of the open land pattern on the site, to include more open land on the main road frontage, and new and enhanced views into the depth of the site
- Provision of a mix of housing that includes a significantly higher proportion of houses in gardens than would be possible if development stuck rigidly to the open land line defined in the UDP

In combination, these benefits amount to the very special circumstances which justify the construction of the proposed housing on the southern part of the designated local open space at the Campion House site.