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Isleworth And Brentford Area Planning Committee 14 July 2005

**CAMPION HOUSE SITE, THORNBURY ROAD, OSTERLEY
DRAFT PLANNING POSITION STATEMENT**

Report by: Borough Planning Officer

SUMMARY

The Champion House site is a large plot of land of 3.26 hectares in size, located on the western side of Thornbury Road, Osterley, within a predominantly residential area outside of the town centre where the neighbouring and adjoining built development is predominantly two-storey in scale, although the houses on the opposite side of Thornbury Road are set at a higher level than the buildings on the Champion House site and there are pockets of three-storey development sited to the south.

The site falls within the Spring Grove Conservation Area. Champion House is itself of merit and, reflecting this, is included on the Council's list of Buildings of Local Townscape Character. The statue known as Ghost or Descent from the Cross, immediately to the south of Champion House, is Grade II Listed. The open space to the rear of the site is designated Local Open Space under the Council's Unitary Development Plan (UDP) and falls within an area of Publicly Accessible Open Space Deficiency.

Since 1929, ownership of the property has been vested in the trustees of The Society of Jesus Trust of 1929 for Charitable Purposes. The actual teaching space at Champion House was for private use as part of the seminary and only covers a small portion of the site area. Therefore, as a residential seminary, the site falls within Use Class C2 (Residential Institutions). The use of the site as a retreat is a use on its own (Sui Generis).

The number of priests trained at the site has declined in recent years, with only two priests having been trained in 2003/2004. The Trust has therefore chosen to relocate the activities at Champion House to another site, rendering the site surplus to its requirements. The Trust's desire to market the site, together with developer interest, has prompted the need to produce a Planning Position Statement that addresses the potential for the future redevelopment of the site.

The Planning and Compulsory Purchase Act (commenced 28 September 2004) established a new planning system in England and Wales. Under the new planning system the Borough is required to produce a Local Development Framework (LDF) within a 3-year period to replace its UDP and provide the basis for land use and spatial planning in the Borough.

The Local Development Scheme (LDS) is effectively a project plan for the production of the Borough's LDF. It outlines what statutory and non-statutory Local Development Documents (LDDs), including Supplementary Planning Documents (SPDs), the Council is proposing to produce and when.

Formal guidance for the Campion House site was not set out in the programme of LDD work that has been agreed by the Secretary of State (through the Government Office for London). In this case and because the relevant regulations for the development of a SPD are more onerous than the previous ones for the development of SPGs (e.g. there is a requirement for a sustainability appraisal to assess the SPD's impact from an environmental, economic and social perspective), with a Government estimate that the process to produce a SPD will take on average one year to complete, the Planning Position Statement will not be adopted as a SPD. It follows, therefore, that the Planning Position Statement would carry little formal weight in the planning process.

This committee report provides relevant background information, site description and context, and site history. It outlines the relevant planning policies and guidance, criteria for any form of future redevelopment of the site, and describes the proposed consultation exercise.

The draft Planning Position Statement for consultation is attached for Member's comments. In summary, it seeks to:

- *Make the best use of previously developed land;*
- *Protect the appearance and setting of Campion House and the statue known as Ghost or Descent from the Cross, and preserve or enhance the character or appearance of the Spring Grove Conservation Area;*
- *Safeguard the existing Local Open Space from encroachment by built development and seek to improve its amenity value and provide improved public access to, and usability of, the Local Open Space;*
- *Protect and maintain existing trees as appropriate and increase the stock and range of trees on site;*
- *Ensure that any new development and activity on and associated with the site does not result in a loss of amenity to surrounding residents or in conditions prejudicial to highway and pedestrian safety;*
- *Ensure that any new development would be built to mobility standards, with access and facilities for people with disabilities, including pedestrian access and car parking;*
- *Take account of sustainable development objectives.*

Whilst it is considered appropriate that the draft Planning Position Statement be subject to consultation with the current owners/occupiers of the site and of neighbouring sites, local residents/community groups, development industry representatives, Council Members, other departments within the Council and relevant statutory consultees, it should be noted that the consultation undertaken will not increase the weight to be attached to the document in the decision making process (i.e. because the informal nature of the Planning Position Statement means that there is no formal requirement for consultation).

RECOMMENDATIONS

- (i) That Members note the content of the covering report.
- (ii) That Members approve the draft Planning Position Statement for consultation purposes.

1.0 GENERAL BACKGROUND TO THE SITE

- 1.1 Campion House was originally called Thornbury and was built in a Venetian style at 3½ storeys in height with lower ground floor, ground, first and second floors. At the time that it was built in 1856, landscaped gardens stretched from the house to the site of St Mary's Church, Osterley Road, and to Church Road to the south. In 1911, Thornbury House became the base of the Jesuit Order for men with a late vocation to the priesthood and the name of the house was changed.
- 1.2 In 1922 work commenced on Nazareth House, a stand-alone single-storey building located in the grounds. It was intended as dormitory space, but later converted to recreation space. A further flat roofed block of 1½ storeys was constructed to the north of Campion House in the 1950s to provide further service space and dining room accommodation. The existing Chapel constructed to the south of Campion House and accessed via the ground floor reception rooms was constructed in 1964.
- 1.3 There is an L-shaped stand-alone accommodation block to the south of Campion House, fronting onto Thornbury Road. It was built between 1964 and 1967 with three-storey residential accommodation in its eastern and southern sections, finished with a pitched roof. A single-storey flat roofed extension projecting at right angles from the southern section provides common room space.
- 1.4 The accommodation block originally accommodated in excess of 150 bedrooms, but these have been amalgamated into 80 or so bedrooms over time to provide a better standard of accommodation.
- 1.5 The single-storey classroom and library blocks to the rear of the accommodation block and Chapel were constructed at a similar time. All these buildings were constructed with engineering brick and metal-framed windows, typical of building style in the 1960s.
- 1.6 A number of smaller buildings have also been developed within the grounds, including Tigar Hall on the southern boundary adjacent to No. 104 Thornbury Road and a small classroom on the northern boundary.
- 1.7 Since 1929, ownership of the property has been vested in the trustees of The Society of Jesus Trust of 1929 for Charitable Purposes (Registered Charity No.230165). These trustees are incorporated as Trustees for Roman Catholic Purposes Registered and this body is the current owner of the property.
- 1.8 The number of priests trained at Campion House has declined in recent years, with only two priests having been trained at the site in 2003/2004. The decision has therefore been taken by the Trust to relocate the activities at Campion House to another site, rendering Campion House surplus to requirements.

2.0 SITE DESCRIPTION AND CONTEXT (SEE MAP 1)

- 2.1 The site is a large plot of land of 3.26 hectares in size, located on the western side of Thornbury Road, Osterley. It lies south of Thornbury Road's junction with Thornbury Avenue, south of where Thornbury Road meets the southern side of the A4 Great West Road to form a traffic light controlled junction, and comprises No.s 104 to 112 Thornbury Road and the adjoining open land to their rear.
- 2.2 The site is within the Spring Grove Conservation Area, which was designated in April 2002 (UDP Proposals Map, Map 2).
- 2.3 The open land in the west of the site is designated Local Open Space under the UDP (Proposals Map, Map 2). The area is recorded in the UDP as having a Publicly Accessible Open Space Deficiency (Map ENV-N1) (i.e. as an area in the Borough that is more than 400 metres from any publicly accessible open space, taking into account barriers to movement, such as railways and major roads).
- 2.4 The site is landscaped, with a number of mature trees to the rear of Campion House and along the site frontage, and contains an array of buildings. These include Campion House, built at 3½ storeys in height, and the three-storey accommodation block to its south. Campion House itself is of merit and, reflecting this, is included on the Council's list of Buildings of Local Townscape Character.
- 2.5 The actual teaching space at Campion House was for private use as part of the seminary and only covers a small portion of the site area. Therefore, as a residential seminary, the site falls within Use Class C2 (Residential Institutions) under the Town and Country Planning (Use Classes) Order 1987, rather than Use Class D1 (Non-Residential Institutions).

Surrounding development

- 2.6 The site lies within a predominantly residential area, outside of the town centre, where the neighbouring and adjoining built development is predominantly two-storey in scale, although the houses on the opposite side of Thornbury Road are set at a higher level than the buildings on the Campion House site and there are pockets of three-storey development sited to the south.
- 2.7 It is immediately bounded to the north by the flank boundary of No. 114 Thornbury Road, a two-storey semi-detached house, and the rear gardens of Thornbury Avenue properties.
- 2.8 Its western rear boundary abuts The Indian Gymkhana Club, which is accessed from Thornbury Avenue through a gap to the south between No's 30 and 32. The club provides for three sports (hockey, cricket and football). It has an all weather sports pitch situated to the south, along the eastern boundary, and to the west of this is an open area of playing fields. The club facilities are currently used by 10 football clubs and it has a contract to run a healthy living club for the over fifties for the Council.
- 2.9 The site's southern flank boundary abuts Kilberry Close properties, planning permission for seven two-storey homes and 54 flats in three-storey blocks with garages, parking spaces and amenity areas having been granted in 1984.
- 2.10 Two-storey semi-detached properties form the predominant character of development opposite, with those dwellings to the north of Church Road sitting above Campion House due to changes in ground level.

Access to the site and car parking provision

- 2.11 Access to the site is via three entrances on Thornbury Road, with the main entrance lying opposite Thornbury Road's junction with Church Road, about midway along the site's frontage. Car parking areas are currently provided within the graveled forecourt area to the front of Campion House and between the accommodation block and Tigar Hall at the southern end of the site.

Public transport accessibility

- 2.12 One of two 'Thornbury Road/Great West Road' bus stops is positioned in front of the site. It is for route H28 heading towards West Middlesex Hospital, with stops to Osterley Library (one minute off peak journey time), West Middlesex Hospital (10 minutes off peak journey time) and Syon Lane Station (15 minutes off peak journey time). The bus stop on the eastern side of Thornbury Road is positioned in front of No.s 127 and 129, opposite Thornbury Road's junction with Thornbury Avenue. Off peak journey time to Hounslow East Station/Hounslow Bus Station Kingsley Road is six minutes.
- 2.13 The site is within easy walking distance of the A4 Great West Road, with the 'Osterley Library' bus stop located just east of the traffic light controlled junction. The stop on the southern side of the trunk road is for route H91 heading towards Hounslow West with a frequency of service between 9am to 8pm of once every 12 minutes. Off peak journey time to Osterley Station is one minute and to Hounslow West Station it is nine minutes.
- 2.14 Osterley Station, a station on London Underground's Piccadilly Line, is situated west of the traffic light controlled junction, on the northern side of the trunk road, approximately 800m from the site.
- 2.15 Isleworth station, one of six stations along the Hounslow Loop line which runs between Kew bridge and Feltham stopping at Brentford, Syon Lane, Isleworth and Hounslow, is situated southeast.
- 2.16 There is an existing cycle route along the northern section of Thornbury Road that links to Isleworth to the south and Osterley Park to the north. There are also existing cycle routes along the northern and southern sides of the A4 Great West Road.
- 2.17 The existing public transport accessibility to the site measured by PTAL is 2 (poor).

3.0 HISTORY OF THE SITE AND ADJOINING LAND

3.1 The site

01119/112/P1: The erection of a building for storage of garden materials.
Granted 20 April 1953.

01119/112/P2: The erection of extensions to form additional kitchen quarters and fuel store.
Granted 8 May 1954.

01119/112/P3: Erection of a building to provide new shower baths.
Granted 12 June 1957.

01119/112/P4: Erection of a new chimneystack.
Granted 23 July 1957.

01119/112/P5: Erection of a building for use as a housemaids' common room. Granted 1 January 1959.

01119/112/P6: Erection of extensions comprising a chapel, classrooms, a study hall and three-storey dormitory block.
Granted (outline) 29 April 1960.

01119/112/P7: Erection of extension comprising a chapel, classrooms, a study hall and three-storey dormitory block.
Granted 19 June 1961.

01119/112/P8: Erection of a building for use as a vegetable store.
Granted 29 October 1962 for a limited period expiring on 31 October 1967.

01119/112/P9: Erection of an extension to an existing study hall.
Granted 24 April 1964.

1119/112/P10: Use of lower ground floor of Sherwin House and adjacent shower block for office, art studio, printing and storage purposes in connection with Church activities.
Granted 22 January 1980 for a limited period expiring on 1 February 1981.

3.2 Kilberry Close

01119/100-102/P2: Demolition of existing buildings, construction of accesses from Oakley Close and erection of seven two-storey homes and 54 flats in three-storey blocks with garages, parking spaces and amenity areas.
Granted in 1984.

3.3 The Indian Gymkhana Club, Thornbury Avenue

The site has had numerous previous planning applications. The most recent are as follows:

01118/B/P10: The erection of a ground and first floor extension to the clubhouse to provide two squash courts, sauna Jacuzzi, gymnasium and ancillary facilities.
Refused at appeal in 1987.

01118/B/P11: Installation of fencing and floodlighting around all weather sports pitch.
Granted in 1989.

01118/B/P12: Erection of 3 temporary portable buildings for use as changing rooms and showers
Granted in 1995.

01118/B/P13: Erection of extension to club comprising changing rooms, squash courts, and toilets.

The application was refused in 1996 for the following reasons:

- 1) The proposed development would result in an intensification of use that would be detrimental to the amenities of local resident due to noise and disturbance particularly at unsocial hours contrary to policies ENV.1.1, ENV.7.1, and T.2.3 of the Council's Unitary Development Plan.
- 2) The proposed development would result in conditions prejudicial to the flow of traffic and general safety contrary to Policy T.2.3 of the Council's Unitary Development Plan.

01118/B/P16: Demolition of existing toilet and changing facilities in temporary structures, removal of an existing staircase from west elevation, and erection of two- and three-storey side extension to replace existing toilets and changing facilities and erection of single-storey extension to south face to create further accommodation to existing function hall to existing building.

Withdrawn 25 February 2005.

01118/B/P17: Demolition of existing toilet and changing facilities in temporary structures, removal of an external staircase from West elevation. Erection of a new staircase to North Elevation, erection of a single-storey extension to east to replace existing changing room and toilet facilities. Erection of a single-storey extension to South to create lobby/reception and further accommodation to existing sports club.

Pending.

4.0 PLANNING ASSESSMENT FRAMEWORK

4.1 NATIONAL AND STRATEGIC PLANNING POLICIES

4.1.1 The relevant Planning Policy Guidance (PPG) are/would likely be as follows:

PPS1	Delivering sustainable development
PPG3	Housing
Circular 06/98	Planning and affordable housing
PPG13	Transport
PPG 15	Planning and the historic environment
PPG17	Planning for open space, sport and recreation
PPG24	Planning and noise
Circular 01/97	Planning obligations

PPS1 (Delivering sustainable development)

4.1.2 PPS1 sets out the Government's overarching planning policies on the delivery of sustainable development through the planning system.

4.1.3 Paragraph 13 lists key principles that should be applied to ensure that decisions taken on planning applications contribute to the delivery of sustainable development, including:

- *Planning policies should promote high quality inclusive design in the layout of new developments and individual buildings in terms of function and impact, not just for the short term but over the lifetime of the development. Design which fails to take the opportunities available for improving the character and quality of an area should not be accepted.*

PPG3 (Housing)

4.1.4 At Paragraph 2, PPG 3 states that local planning authorities should:

- *plan to meet the housing requirements of the whole community, including those in need of affordable and special needs housing;*
- *provide wider housing opportunity and choice and a better mix in the size, type and location of housing than is currently available, and seek to create mixed communities;*
- *provide sufficient housing land but give priority to re-using previously-developed land within urban areas, bringing empty homes back into use and converting existing buildings, in preference to the development of greenfield sites;*
- *create more sustainable patterns of development by building in ways which exploit and deliver accessibility by public transport to jobs, education and health facilities, shopping, leisure and local services;*
- *make more efficient use of land by reviewing planning policies and standards;*
- *place the needs of people before ease of traffic movement in designing the layout of residential developments;*
- *seek to reduce car dependence by facilitating more walking and cycling, by improving linkages by public transport between housing, jobs, local services and local amenity, and by planning for mixed use; and*
- *promote good design in new housing developments in order to create attractive, high-quality living environments in which people will choose to live.*

4.1.5 PPG3 therefore recognises that it may be desirable in planning terms for new housing development on a substantial scale to incorporate a reasonable mix and balance of house types and sizes to cater for a range of housing needs. Whilst this is intended to encourage the development of mixed and balanced communities, it is also intended to ensure that affordable housing is only required on sites that are large enough to accommodate a reasonable mix of types and sizes of housing.

Circular 06/98 (Planning and affordable housing)

4.1.6 Circular 06/98 supplements PPG3, by amplifying the Government's preferred approach to planning and affordable housing. It states at Paragraph 24:

Where a local planning authority considers, having regard to the policy in this Circular, that certain sites are suitable for inclusion of an element of affordable housing and an applicant does not make such provision as part of the proposed development, such a failure could justify the refusal of planning permission.

PPG13 (Transport)

4.1.7 The objectives of this guidance are to integrate planning and transport at the national, strategic and local level to:

1. *promote more sustainable transport choices for both people and for moving freight;*
2. *promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling, and*
3. *reduce the need to travel, especially by car.*

- 4.1.8 In order to deliver its objectives, PPG13 states that when preparing development plans and considering planning applications local planning authorities should, amongst other things,
3. *accommodate housing principally within existing urban areas, planning for increased intensity of development for both housing and other uses at locations which are highly accessible by public transport, walking and cycling;*
 7. *use parking policies, alongside other planning and transport measures, to promote sustainable transport choices and reduce reliance on the car for work and other journeys;*
 8. *give priority to people over ease of traffic movement and plan to provide more road space to pedestrians, cyclists and public transport in town centres, local neighbourhoods and other areas with a mixture of land uses;*
 9. *ensure that the needs of disabled people as pedestrians, public transport users and motorists - are taken into account in the implementation of planning policies and traffic management schemes, and in the design of individual developments; consider how best to reduce crime and the fear of crime, and seek by the design and layout of developments and areas, to secure community safety and road safety; and*

PPG15 (Planning and the historic environment)

- 4.1.9 This PPG provides a full statement of Government policies for the identification and protection of historic buildings, conservation areas, and other elements of the historic environment.
- 4.1.10 At Paragraph 2.14, PPG15 states that the design of new buildings intended to stand alongside historic buildings needs very careful consideration and that, in general, it is better that old buildings are not set apart, but are woven into the fabric of the living and working community. It states that this can be done, provided that the new buildings are carefully designed to respect their setting, follow fundamental architectural principles of scale, height, massing and alignment, and use appropriate materials.
- 4.1.11 The statue known as Ghost or Descent from the Cross is Grade II listed. It is therefore noted that Paragraph 2.16 of PPG15 sets out that Sections 16 and 66 of the Act require authorities considering applications for planning permission or listed building consent for works which affect a listed building to have special regard to certain matters, including the desirability of preserving the setting of the building. Paragraph 3.2 then sets out that listed building controls apply to all works, both external and internal, that would affect a building's special interest, whether or not the particular feature concerned is specifically mentioned in the list description.
- 4.1.12 At Paragraph 4.17, PPG15 states that many conservation areas include gap sites, or buildings that make no positive contribution to, or indeed detract from, the character or appearance of the area and that their replacement should be a stimulus to imaginative, high quality design, and seen as an opportunity to enhance the area. It states that what is important is not that new buildings should directly imitate earlier styles, but that they should be designed with respect for their context, as part of a larger whole which has a well-established character and appearance of its own.

4.1.13 Guidance on trees is set out at Paragraphs 4.38 – 4.40. Paragraph 4.40 states that when considering whether to extend protection to trees in conservation areas, local planning authorities should always take into account the visual, historic and amenity contribution of trees and that in some instances new plantings or re-plantings may be desirable where this would be consistent with the character and appearance of the area.

PPG17 (Planning for open space, sport and recreation)

4.1.14 PPG17 states that in its application open space should be taken to mean all open space of public value, including not just land, but also areas of water such as rivers, canals, lakes and reservoirs which offer important opportunities for sport and recreation and can also act as a visual amenity.

4.1.15 Paragraph 10 states that existing open space, sports and recreational buildings and land should not be built on unless an assessment has been undertaken which has clearly shown the open space or the buildings and land to be surplus to requirements. It states that for open space, 'surplus to requirements' should include consideration of all the functions that open space can perform, in recognition that not all open space, sport and recreational land and buildings are of equal merit and some may be available for alternative uses. It goes on to state that in the absence of a robust and up-to-date assessment by a local authority, an applicant for planning permission may seek to demonstrate through an independent assessment that the land or buildings are surplus to requirements.

4.1.16 Paragraph 16 states that in considering planning applications – either within or adjoining open space – local authorities should weigh any benefits being offered to the community against the loss of open space that will occur and seek to ensure that all proposed development takes account of, and is sensitive to, the local context.

4.1.17 Paragraph 17 states that local authorities should:

- i. avoid any erosion of recreational function and maintain or enhance the character of open spaces;
- ii. ensure that open spaces do not suffer from increased overlooking, traffic flows or other encroachment;
- iii. protect and enhance those parts of the rights of way network that might benefit open space; and
- iv. consider the impact of any development on biodiversity and nature conservation.

4.1.18 Paragraph 33 states that planning obligations should be used as a means to used as a means to remedy local deficiencies in the quantity or quality of open space, sports and recreational provision and that local authorities will be justified in seeking planning obligations where the quantity or quality of provision is inadequate or under threat, or where new development increases local needs.

PPG24 (Planning and noise)

- 4.1.19 PPG24 outlines the considerations to be taken into account in determining planning applications both for noise sensitive developments and for those activities which will generate noise; introduces the concept of noise exposure categories for residential development, encourages their use and recommends appropriate levels for exposure to different sources of noise; and advises on the use of conditions to minimise the impact of noise.

Circular 01/97 (Planning obligations)

- 4.1.20 Where appropriate, a local planning authority may seek to enter into planning obligations with a developer regarding the use or development of the land concerned or of other land or buildings. Planning obligations should only be sought only where they meet the following tests:
- i. necessary;
 - ii. relevant to planning;
 - iii. directly related to the proposed development;
 - iv. fairly and reasonably related in scale and kind to the proposed development;
 - v. reasonable in all other respects.

4.2 THE LONDON PLAN

- 4.2.1 The relevant policies of The London Plan Spatial Development Strategy for Greater London Adopted February 2004 are/would likely be as follows:

Living in London

- Policy 3A.1 Increasing London's supply of housing
- Policy 3A.2 Borough housing targets
- Policy 3A.4 Housing choice
- Policy 3A.6 Definition of affordable housing
- Policy 3A.7 Affordable housing targets
- Policy 3A.8 Negotiating affordable housing in individual private residential and mixed-use schemes
- Policy 3A.14 Addressing the needs of London's diverse population

Connecting London – Improving Travel in London

- Policy 3C.1 Integrating transport and development
- Policy 3C.2 Matching development to transport capacity
- Policy 3C.22 Parking strategy

Enjoying London

- Policy 3D.7 Realising the value of open space
- Policy 3D.10 Open space provision in UDPs
- Policy 3D.11 Open space strategies

London's Metabolism: Using and Managing Natural Resources

Policy 4A.7 Energy efficiency and renewable energy

Policy 4A.14 Reducing noise

Designs on London

Policy 4B.1 Design principles for a compact city

Policy 4B.3 Maximising the potential of sites

Policy 4B.5 Creating an inclusive environment

Policy 4B.6 Sustainable design and construction

Policy 4B.7 Respect local context and communities

Policy 4B.11 Heritage conservation

Living in London Policies

4.2.2 **Policy 3A.4** sets out that new housing development should help to promote mixed and balanced communities by taking account of changes in household characteristics and lifestyles and by offering a range of housing types and sizes.

4.2.3 **Policy 3A.6** seeks to achieve a range of types of affordable housing.

4.2.4 **Policy 3A.7** seeks to increase the provision of affordable housing, towards meeting the overall 50 per cent Londonwide affordable housing target and, within that, the Londonwide objective of 70 per cent social housing and 30 per cent intermediate provision.

Connecting London Policies

4.2.5 **Policy 3C.22** seeks to ensure that on-site car parking at new developments is the minimum necessary and that there is no over-provision that could undermine the use of more sustainable non-car modes. It states that the only exception to this approach will be to ensure that developments are accessible for disabled people.

Enjoying London Policies

4.2.6 The London Plan states that London's open space includes both spaces that are private and those that are accessible to the public and, amongst other things, that Boroughs should produce open space strategies to protect, create and enhance all types of open space in their area.

Designs on London Policies

4.2.7 Ensuring that developments maximise the potential of the site; are accessible, usable and permeable for all users; are safe for occupants and passers-by; and respect local context, character and communities are amongst the principles of design for a compact city set out at **Policy 4B.1**.

4.2.8 **Policy 4B.3** seeks the highest possible intensity of use compatible with local context, the design principles in Policy 4B.1 and with public transport capacity, and provides a density location and parking matrix.

4.2.9 Appropriate density ranges are related to location, setting in terms of existing building form and massing, and the index of public transport accessibility (PTAL).

4.2.10 In relation to Policy 4B.3, the Council considers that the site setting of Campion House would be suburban. In this respect and with a PTAL rating of 2, Table 4B.1 of The London Plan provides the following appropriate density range:

			Car parking provision	High 2 – 1.5 spaces per unit	Moderate 1.5 – 1 space per unit
			Predominant housing type	Detached and linked houses	Terraced houses and flats
Location	Accessibility Index	Setting			
Sites along transport corridors and sites close to a town centre	3 to 2	Suburban	150-200 habitable rooms per hectare 30-65 units per hectare Average 4.4 habitable rooms per unit	200-250 habitable rooms per hectare 50-80 units per hectare Average 3.8 habitable rooms per unit	

4.2.11 **Policy 4B.5** requires that all future development meet the highest standards of accessibility and inclusion and **Policy 4B.6** that the highest standards of sustainable design and construction are met. It states, for example, that sustainable design and construction will include measures to conserve energy, materials, water and other resources; and reduce the impacts of noise, pollution, flooding and micro-climate.

4.2.12 **Policy 4B.7** calls for Boroughs to work with local communities to ensure proposed developments preserve or enhance local social, physical, cultural, historical, environmental and economic characteristics.

4.2.13 **Policy 4B.11** calls for Boroughs to identify areas, spaces and buildings of special quality or character and adopt policies for their protection and the identification of opportunities for their enhancement, taking into account the strategic London context; and encourage and facilitate inclusive solutions to providing access for all, to and within the historic environment.

4.3 LONDON BOROUGH OF HOUNSLOW UNITARY DEVELOPMENT PLAN

4.3.1 The relevant policies of the London Borough of Hounslow Unitary Development Plan Adopted December 2003 (UDP) are/would likely be as follows:

Implementation Policies

- IMP.1.1 Integrating patterns of land use and the provision of transport
- IMP.1.2 The re-use and recycling of urban land
- IMP.5.1 High quality building and urban design
- IMP.6.1 Planning obligations

Natural Environment Policies

- ENV-N.1.11 Protection and improvement of Local Open Space
- ENV-N.1.10 Provision of new Local Open Space
- ENV-N.2.7 Trees and Community Woodland
- ENV-N.2.8 Tree Preservation Orders

Built Environment Policies

- ENV-B.1.1 New development
- ENV-B.1.8 Access and facilities for people with disabilities
- ENV-B.1.9 Safety and security
- ENV-B.2.2 Conservation Areas
- ENV-B.2.5 Development affecting the setting of a listed building
- 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

Environmental Protection Policies

- ENV-P.1.4 Waste water management
- ENV-P.1.5 Noise pollution
- ENV-P.1.7 Light Pollution
- ENV-P.2.4 Recycling facilities in new developments

Housing Policies

- H.1.1 Location of new housing development
- H.2.1 Affordable housing
- H.4.1 Housing standards and guidelines
- H.4.2 Residential density
- H.4.3 Residential mix
- H.4.4 Provision for children's play in housing developments
- H.4.5 Associated facilities for residential developments
- H.5.1 Housing for people with disabilities

Community and Leisure Policies

- C.1.4 New Social and Community Facilities
- C.2.1 Educational Facilities
- C.5.1 New Leisure Development

Transport Policies

- T.1.2 The movement implications of development
- T.1.3 Development affecting public transport services
- T.1.4 Car and cycle parking and servicing facilities
- T.2.1 Pedestrian access
- T.2.2 Pedestrian safety and security
- T.2.4 Public transport infrastructure
- T.4.3 Traffic implications

Implementation Policies

- 4.3.2 **Policy IMP.1.1** states that patterns of land use will be encouraged within the Borough where they contribute to urban regeneration and the re-use of previously developed land whilst creating a more sustainable pattern of development. It states that all new development should contribute to improving the natural and built environment for the benefit of all those who live, work and visit the Borough and in order to encourage investment. It also states that developments which are likely to generate a high number of trips will be considered with regard to their accessibility by walking, cycling and public transport and that, where appropriate, a contribution will be necessary to facilitate improvements.
- 4.3.3 **Policy IMP.1.2** encourages the conversion of existing buildings and/or the recycling of previously developed land.
- 4.3.4 Under **Policy IMP.5.1** the Council encourages high quality building, urban and landscape design to create a sense of place and identity, especially in sensitive locations such as those close to or in areas of high townscape value.
- 4.3.5 **Policy IMP.6.1** seeks to ensure that a developer enters into a planning obligation to secure planning benefits related to the proposed development where appropriate.

Natural Environment Policies

- 4.3.6 Local Open Spaces are public and private open areas outside the Green Belt and Metropolitan Open Land which provide essential visual breaks in built up areas, contribute to local amenity, and meet, or are capable of meeting recreational needs. These Local Open Spaces also often have an important nature conservation role.
- 4.3.7 Under **Policy ENV-N.1.11**, the Council seeks to protect, maintain and enhance the openness, landscape quality and wildlife habitats of Local Open Spaces in the Borough. Planning permission will not normally be granted for any development or change of use which would result in the loss of, encroachment upon or form an intrusive element in, the overall open aspects of public open space; playing fields; private open space, particularly where this forms part of a larger open area and is of benefit to the local community; and allotments and leisure gardens.
- 4.3.8 Under **Policy ENV-N.1.10**, the Council seeks to increase the provision of Local Open Space in the Borough, especially in areas of Open Space Deficiency as shown on Map ENV-N1, and also to increase public accessibility Local Open Space. Space and improvement of public access to Local Open Space will be encouraged by the use of Planning Obligations in conjunction with new developments.
- 4.3.9 The Council aims through **Policy ENV-N.2.7** to protect all trees in the Borough that contribute to the value of the environment and will seek to achieve replacement of new tree planting in connection with development proposals where appropriate.

- 4.3.10 **Policy ENV-N.2.8** states that the Council will ensure that adequate provision is made for the preservation, (including proper measures for practical protection) and planting of trees, when granting planning permission, by imposing conditions and making Tree Preservation Orders.
- 4.3.11 All trees in Conservation Areas are protected in a similar way to trees with a Tree Preservation Order provided that the diameter of the tree is greater than 75mm measured at 1.5m above the ground.

Built Environment Policies

- 4.3.12 **Policy ENV-B.1.1** establishes the Council's general design expectations. It seeks to ensure that any development is compatible with the character of the area and enhances it in terms of size, scale, materials and design. Amongst other things it states that development proposals should make a positive contribution to the overall environmental quality, minimise any detrimental impact on adjoining properties by applying the Council's adopted standards and comply with all appropriate planning policies and guidelines.
- 4.3.13 **Policies ENV-B.1.1 and ENV-B.1.8** seek to ensure that development proposals and refurbishments are designed so as to be fully accessible to people with disabilities or impaired mobility and have regard in particular to the Council's 'Think Access' guidelines where practicable.
- 4.3.14 **Policy ENV-B.1.9** states any new developments or refurbishments should be designed to create a safe and secure environment and to reduce the opportunities for crime in accordance with the Council's Safety and Security Guidelines in Supplementary Planning Guidance. These design considerations include the design and layout of buildings, car parking, public spaces, the creation of private spaces, pedestrian ways, lighting, landscape details, and linkages to other uses such as town centres and transport facilities.
- 4.3.15 Developers should consider obtaining accreditation from the Metropolitan Police Service's 'Secured by Design' scheme.
- 4.3.16 The Council has designated the Spring Grove Conservation Area as being an area of special architectural and historic merit. **Policy ENV-B.2.2** states that the Council will preserve or enhance its character or appearance by ensuring any development is respectful of the character of the existing architecture in scale, design and materials. It also states that there will be a presumption in favour of retaining any building in a conservation area that makes a positive contribution to the character or appearance of the area.
- 4.3.17 **Policy ENV-B.2.5** reads, "The Council will have special regard to the desirability of preserving the setting of a listed building in considering whether to grant listed building consent or planning permission by appropriate controls over proposals including design, scale, height, massing and alignment and use of appropriate materials".
- 4.3.18 **Policy ENV-B.2.6** seeks to protect buildings of local townscape character and their settings.
- 4.3.19 **Policy ENV-B.2.7** seeks to ensure that any new development preserves and enhances these buildings and their settings. Under it, the Council will resist proposals to demolish or alter buildings of local townscape character.

Environmental Protection Policies

- 4.3.20 **Policy ENV-P.1.4** calls for developments to take place only where existing infrastructure is adequate or where new facilities will be provided to coincide with the new demand.
- 4.3.21 **Policy ENV-P.1.5** seeks to reduce as far as practicable the noise from all sources, stating that the Council will not allow any development proposals which could result in unacceptable levels of noise nuisance to nearby existing or future occupiers.
- 4.3.22 When considering proposals for lighting or floodlighting of buildings, sport, leisure or other facilities, **Policy ENV-P.1.7** requires that the Council take account of the effect on the character and amenity of the surrounding area.
- 4.3.23 New applications for housing developments should provide space for composting facilities and readily accessible recycling facilities for storage and the collection of materials such as glass, cans, paper, plastics and textiles under **Policy ENV-P.2.4**. These facilities should be sited in convenient, locations and should be screened in order that they can protect the amenities of nearby residents whilst making a positive contribution to the local environment.

Housing Policies

- 4.3.24 **Policy H.1.1** states that new housing should be located in accordance with the Council's framework for sustainable development and regeneration set out in the Implementation chapter of the UDP.
- 4.3.25 **Policy H.2.1** requires that all housing developments in the Borough capable of providing 20 or more dwellings and/or residential sites 0.75 hectares or more should make provision for on-site affordable housing. It states, "The Council will negotiate with developers to secure the highest achievable provision of affordable housing on every suitable site, having regard to the specific local need for affordable housing, including the need to achieve a target of 300 additional affordable dwellings a year, site circumstances, the economics of provision and the need to achieve a successful development".
- 4.3.26 There is a borough wide target of 50% affordable housing. The exact level of provision would be subject to site conditions, however provision below the 50% would require strong and detailed justification.
- 4.3.27 **Policy H.4.1** requires that all housing developments in the Borough have regard to the Council's current housing standards and guidelines for form and design; daylight and sunlight; privacy and spacing between buildings; private amenity space; roads, footpaths, parking and servicing; recycling and composting; refuse storage and collection; and noise.
- 4.3.28 Careful consideration should be given for the siting of areas for the disposal and collection of rubbish and to include recycling arrangements where appropriate.
- 4.3.29 In addition to private amenity space, the Council will normally require under **Policy H.4.4** that children's formal and informal playspace is provided which is reasonably related to the scale of the proposed residential development.

- 4.3.30 **Policy H.4.2** sets a range of densities to guide and control residential development. Residential density in new schemes should take account of the established density of the surrounding areas and should normally be not less than 150 habitable rooms per hectare nor exceed 250 habitable rooms per hectare.
- 4.3.31 With regards to residential density, this will be of secondary importance after the merits of any scheme have been considered.
- 4.3.32 **Policy H.4.3** seeks to encourage developers to provide accommodation for a mix of housing types. In schemes of 20 or more units there should normally be a mix of family and non-family units. Family housing consists of three bed spaces and over.
- 4.3.33 **Policy H.4.5** states that in considering new housing development, the Council will seek where appropriate, in accordance with Policy IMP.6.1, the provision of new community facilities, health facilities (if required), educational facilities, recreational open space and contributions to the improvement of public transport which is physically accessible to all, if existing public transport is not within easy walking distance.
- 4.3.34 New housing, provided by new build, change of use or conversion should normally be built to include housing for people with disabilities. Where there is an identified need, **Policy H.5.1** states wheelchair housing should be provided in larger residential schemes, normally over 20 units. To meet the needs of people confined to a wheelchair, 10% of units in such schemes should be built to wheelchair standards. All residential schemes would be expected to provide parking suitable for people with disabilities.

Community and Leisure Policies

- 4.3.35 **Policy C.1.4** states that within substantial new housing developments the Council will seek the provision of new social and community facilities. Proposals will only be considered appropriate where the privacy and amenity of adjacent occupiers and the neighbouring area can be preserved and the use does not result in a detrimental effect on highway conditions.
- 4.3.36 Although the site falls within Use Class C2 (as discussed at the 'Site Description and Context'), **Policy C.2.1** is considered applicable. It states that where the educational use of a building is no longer required the future use will be determined by the nature and location of the site and by the application of the policies and priorities of the UDP.
- 4.3.37 **Policy C.5.1** requires that the Council will adopt a sequential approach in considering applications for new leisure development. It states that new leisure development should be located within existing town centres and that edge of centre sites, followed by district and town centres should be considered next. Only following the consideration of these locations should other locations be considered, and only then when they are, or will be made highly accessible by public transport.
- 4.3.38 **Policy C.5.1** then lists a number of criteria for consideration in respect of new leisure development, including the suitability of the proposed use to the location; the scale, design and intensity of the proposed use and its impact on local character, amenity and environment; trip generation, highway safety and movement; provision of appropriate access for people with impaired disability; and accessibility by a range of transport modes.

Transport Policies

- 4.3.39 Before granting planning permission the Council must be satisfied under **Policy T.1.2** that proposals for new development will be readily accessible by sustainable modes. All proposals should ensure that the development promotes access by walking, cycling and public transport with the aim of maximising the proportion of trips to developments by these modes.
- 4.3.40 **Policy T.1.3** states that the Council will not permit a development that would have a detrimental effect on public transport services.
- 4.3.41 All developments must provide parking and servicing facilities in accordance with the Council's standards under **Policy T.1.4**. The standards include provision that must be made for people with disabilities and operational parking (i.e. spaces for servicing, loading and unloading and other traffic which must park on the premises) which must be met on site. **Appendix 3** (Parking Standards) sets a maximum off-street parking requirement of:
- Studio unit: one space per two units – all spaces to be generally accessible
 - One and two bedroom unit: one space per unit plus 10% visitor space per unit
 - Three+ bedroom unit: two spaces per unit
- 4.3.42 A lower provision is applicable to developments that conform to the UDP definition of affordable housing and are guaranteed to remain as such.
- 4.3.43 In relation to wheelchair housing the level of provision should be as above (Paragraph 4.3.41) with a minimum of one wider space.
- 4.3.44 Where appropriate, applicants will be expected to indicate measures which would form part of a Section 106 Legal Agreement in order to secure mitigation for the potential detrimental effects of the development.
- 4.3.45 **Policy T.2.1** requires that particular emphasis be given to measures to encourage walking, stating amongst other things that, where appropriate, the Council will seek improvements to pedestrian footways leading to the premises and amenities and will require good pedestrian access to and within all new developments.
- 4.3.46 All new proposals will be considered with regard to the safety and security of all users of pedestrian areas and footways and car parks under **Policy T.2.2** so that where new facilities are proposed they should be designed with the safety and security of pedestrians as a priority, addressing any existing problem areas which may discourage people from walking and allowing people to take the most direct, surface level route possible.
- 4.3.47 Under **Policy T.2.4** the Council seeks improvements to public transport infrastructure as well as the provision of access and parking for bicycles.
- 4.3.48 All development proposals will be assessed for their road safety implications, their contribution to traffic congestion and in the light of the present and potential capacity of public transport in accordance with **Policy T.4.3**. Development will not be permitted if the traffic movement directly associated with it would increase danger, cause unacceptable noise, congestion or environmental intrusion.

SUPPLEMENTARY PLANNING GUIDANCE

4.3.49 The relevant supplementary planning guidance includes/would likely be as follows:

London Borough of Hounslow Unitary Development Plan Supplementary Planning Guidance (February 1997)

General standards and controls:

- Section 1 Design and layout
- Section 3 Safety and security guidelines
- Section 4 Daylight and sunlight

Residential standards and controls:

- Section 9 Form and design
- Section 10 Private amenity space
- Section 11 Roads, footpaths, parking and servicing
- Section 12 Internal space provision
- Section 13 Housing for people with disabilities

Think Access – Design for Accessibility (April 2000)

Spring Grove Conservation Area (report to the Sustainable Development Committee meeting of 18 April 2002)

London Borough of Hounslow Unitary Development Plan Supplementary Planning Guidance (February 1997)

- 4.3.50 The standards and controls given in the Supplementary Planning Guidance (February 1997) are the Council's adopted criteria against which planning applications are assessed. Once the principle of development is accepted, the Council will seek compliance with these standards and controls while recognising that sensitivity and flexibility will be required to take into account individual circumstances.
- 4.3.51 Amongst other things, **Section 1** states that new buildings must relate satisfactorily to adjoining and neighboring buildings and spaces, respecting their scale, massing, siting, size and height – although this need not exclude original innovative design solutions – and developments should be designed to show a clear distinction between the public and the private areas.
- 4.3.52 **Section 3** seeks to help create a safe and secure environment and states that all applications should meet the following principles:
- Ensure there is defensible space around buildings, making a clear distinction between public and private areas
 - Allow for overlooking of and safe access to open spaces around buildings;
 - Restrict entry to private areas
 - Provide clear sight lines avoiding dead ends, recesses and blind corners.

4.3.53 Detailed guidelines relate to dwellings and spaces around buildings, small open spaces and other access ways to help developers avoid unintentional opportunities for crime.

4.3.54 **Section 4** states that the Council will use advice set out in the 'Building Research Establishment Report: Site layout Planning for Daylight and Sunlight – A Good Practice Guide' (1991), which aims "to help to ensure good conditions in the local environment, considered broadly, with enough sunlight and daylight on or between buildings for good interior and exterior conditions".

4.3.55 The form and layout of residential development should integrate with surrounding streets and facilitate ease of pedestrian movement and minimise through routes under **Section 9**. Amongst other things, Section 9 also states that the design should ensure logical layout with dwellings having a frontage onto a residential street and privacy provided at the rear of buildings.

4.3.56 Under **Section 10** the Council seeks that useable amenity space, providing a suitable shape, aspect and siting and having appropriate boundary treatment, normally be provided at no less than the following standards:

Each house	Area
3 habitable rooms and under	50 square metres
4 habitable rooms	60 square metres
5 habitable rooms and over	75 square metres

4.3.57 Other forms of residential development should provide communal areas for the exclusive use of that development, normally at no less than the following standards:

Each flat	Area
3 habitable rooms and under	25 square metres
4 habitable rooms	30 square metres
5 habitable rooms and over	40 square metres

4.3.58 **Section 11** states that wherever possible parking at the rear of the building should be avoided to prevent the loss of private amenity space and soft landscaping; that parking at the front or side should be incorporated with an integrated landscaping scheme and accord with road safety considerations; and that cycle provision in residential developments should be located in a safe, secure and accessible location, preferably under cover, at the following standard:

	1 space (x) square metres gross floor area
General housing	150
Student housing	100
Sheltered housing	450

4.3.59 Amongst other things, Section 11 also states that servicing arrangements should enable vehicles to enter and leave housing development sites in forward gear.

4.3.60 Internal space standards are set out at **Section 12**. The Council considers that the floor area standards are the minimum acceptable in all new dwellings and encourages the provision of higher floor areas than the minimum specified:

Type of dwelling	No of occupants					
	6	5	4	3	2	1
3-storey house	98	94	-	-	-	-
2-storey house or maisonette	92	82	72	-	-	-
Flat	86	79	70	57	45	30
Single-storey house	84	75	67	57	45	30

NB: The net floor areas are calculated from internal dimensions of the units and include internal partitions and chimney breasts, but exclude any rooms with sloping ceilings where the headroom is less than 1.52m.

4.3.61 In addition, Section 12 sets out minimum room sizes in conversions:

	Family Unit (two bedrooms or more)		Non-Family Unit (one bedroom)	
Living room	15	(160)	12.5	(135)
Dining/living room	16	(172)	14	(150)
Working kitchen	7.5	(80)	5.5	(60)
Kitchen/diner	9	(97)	7.5	(80)
Main bedroom	12	(130)	12	(130)
Other double bedroom	10	(108)		
Single bedroom	6.5	(70)	6.5	(70)
Bathroom	3.7	(40)	.7	(40)

Areas are represented in square metres (square feet)

4.3.62 Whilst a more flexible approach to internal space standards can be adopted in relation to new residential developments, all rooms should be of a size and shape to allow satisfactory arrangement of furniture and circulation space.

4.3.63 **Section 13** encourages developers to design dwellings and their surroundings that are convenient to visit and are easily adapted to meet more specialized needs of individual people.

Think Access – Design for Accessibility (April 2000)

4.3.64 It is the Council's intention to ensure that people with disabilities are able to take a full part in community life. Improving physical access is just one step towards this goal.

4.3.65 Amongst other things, the 'Think Access' guidelines states that suitable parking spaces for cars driven by or carrying a person with a disability should be provided on level ground as close as possible to an accessible entrance; pedestrian routes should be as level as possible, smooth and non-slip; doors should be easy to open and not heavily spring-loaded; and that accessible WC facilities should be provided.

4.3.66 Of note, **The London Plan** strongly supports the principles of Lifetime Homes, with Policy 3A.4 stating Boroughs should take steps to identify the full range of housing needs within their areas. Policy 3A.4 also states UDP policies should seek to ensure that:

- New developments offer a range of housing choices, in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups, such as students, older people, families with children and people willing to share accommodation
- All new housing is built to 'Lifetime Homes' standard
- Ten per cent of new housing is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users

Spring Grove Conservation Area
(report to Sustainable Development Committee meeting of 18 April 2002)

4.3.67 Member's approval for the proposed designation of the Spring Grove Conservation Area and for buildings to be included on the list of Buildings of Local Townscape Character was sought at the Sustainable Development Committee meeting of 18 April 2002.

4.3.68 Paragraph 6.2.9 of the report states that there is a wide range of property types on Thornbury Road. In relation to Campion House, Paragraph 6.2.9 states,

It is thought that Davies built Thornbury House as part of the estate, and moved to the house in the 1860s. Thornbury is the village in Gloucestershire from where the Davies family originated. At that time landscaped gardens stretched from the house to the site of St. Mary's Church. In 19911 Thornbury House became the base of the Jesuit Order for men with a late vocation to the priesthood, and the name of the house was changed. 1400 students have passed through the house and for many years the students grew all their fruit and vegetables. Though now surrounded by more recent development the original property is a substantial stuccoed building with a projecting portico and flanking steps.

4.3.69 Campion House is included at Paragraph 9.1 as a building of merit that contributes to local architectural interest, local historical interest, local historical value and local group value, and so recommended for inclusion on the list of Buildings of Local Townscape Character.

4.3.70 Further reference to Campion House is found at Paragraph 11.1 'Assessment of the Character of the Area':

The grand Victorian suburb of Spring Grove designed on the Davies original estate plan still remains, albeit in an evolved form, in much of its splendour, with the prevailing pattern of development mostly being respectful. ...tall gaunt classical villas standing in spacious gardens, the grandiose Italianate stuccoed mansion of Campion House, the characteristic Gothic structure of Lancaster House, and more subtle Arts and Crafts styled semi-detached properties, along with others, amalgamate into the whole.

5.0 EXISTING FACTORS AFFECTING DEVELOPMENT/CONSTRAINTS

5.1 Any redevelopment of the site would be affected by the following existing factors:

- The Spring Grove Conservation Area, which was designated in April 2002
- The inclusion of Campion House on the Council's List of Buildings of Local Townscape Character and the Grade II listing of the statue known as Ghost or Descent from the Cross, immediately to the south of Campion House – any new development must be carefully designed to preserve and enhance Campion House, the Grade II listed statue and their settings, and be of an appropriate design, scale, height, massing and alignment with the use of appropriate materials
- A significant area is identified as Local Open Space and the site lies within an area of Publicly Accessible Open Space Deficiency – it is important not only to safeguard the existing open space from encroachment by built development, but also to ensure that opportunities are taken to improve its amenity value and provide improved public access to, and usability of, the Local Open Space
- There are a number of trees across the site – regard must be given to protecting and maintaining existing trees as appropriate and any new development should also seek to increase the stock and range of trees on site
- Views into and out of the site – the most important views of the site are of Campion House, with views from Thornbury Road – regard should be given to local views and glimpses in and out of the site with a view to integrating the open space with the surrounding development and providing informal surveillance

6.0 CRITERIA

6.1 Any form of future redevelopment of the site should meet the following criteria having regard to the planning assessment framework referred to in Section 4.0 of this Planning Position Statement:

- Make the best use of previously developed land;
- Protect the appearance and setting of Campion House, a Building of Local Townscape Character, and the Grade II listed statue known as Ghost or Descent from the Cross;
- Ensure that any works respect the integrity of Campion House;
- Ensure that any works preserve or enhance the character or appearance of the Spring Grove Conservation Area;
- Safeguard the existing Local Open Space from encroachment by built development and seek to improve its amenity value and provide improved public access to, and usability of, the Local Open Space;
- Ensure that the Local Open Space and Campion House are well maintained and managed with a view to securing their long term viability;
- Protect and maintain existing trees as appropriate and seek to increase the stock and range of trees on site;
- Ensure that any new development and activity on and associated with the site does not result in a loss of amenity to surrounding residents or in conditions prejudicial to highway and pedestrian safety;
- Demonstrate that provision is made for disabled people (e.g. would be built to mobility standards, with access and facilities for people with disabilities, including pedestrian access and car parking); and
- Take account of sustainable development objectives.

7.0 PROPOSED LAND USES

- 7.1 The central factors in determining the appropriate uses for the site are the existing use of the site, the sustainability of the site in terms of the reuse of previously developed land, the protection of existing Local Open Space, the type of surrounding land use, accessibility by modes of travel other than car and relevant planning policy. All uses would be expected to meet the criteria set out in Paragraph 6.1 above.

Residential Development

- 7.2 Residential development would potentially make an important contribution towards addressing local housing need, particularly in respect of affordable housing, including student accommodation and the needs of key workers such as teachers and health and social workers (see UDP Policy H.2.1), and should cater for mixed communities, including elderly people and people with disabilities (see UDP Policies H.4.3 and H.5.1).
- 7.3 Residential development would be considered through conversion of existing buildings or redevelopment as appropriate within the existing developed part of the site. It would be unlikely to be considered favourably on that part of the site designated as Local Open Space in accordance with UDP Policies ENV-N.1.11 and ENV-N.1.10, which seek to increase the provision of and public accessibility to areas of Local Open Space, especially in areas identified as having a Publicly Accessible Open Space Deficiency. Further, there will be a presumption in favour of retaining any building that makes a contribution to the character and appearance of the Spring Grove Conservation Area (see UDP Policy ENV-B.2.2). New buildings should be well designed and complement existing buildings that are to remain on the site.
- 7.4 The Council's upper limit for residential density is 250 habitable rooms per hectare (see UDP Policy H.4.2). Having regard to the site's suburban setting and its PTAL rating of 2, the appropriate density ranges under the London Plan (Table 4B.1) are 150-200 habitable rooms per hectare for detached and linked houses and 200-250 habitable rooms per hectare for terraced houses and flats.
- 7.5 Density standards are a useful tool for house development in order to protect local character and to assist developers in preparing their proposals. However, good urban design and the need to respect, enhance and relate to Campion House, adjoining residential properties, as well as preserve or enhance the character or appearance of the Spring Grove Conservation Area generally, are considered to be paramount. The density of any residential development should take into account the accessibility of the site, the existing built form on the site and the surrounding townscape. Developers are recommended to refer to national and local guidance relating to design and sustainable residential quality.
- 7.6 Any new residential development must also accord with the Council's Residential Standards and Controls for internal space provision, private amenity space, and parking and servicing in accordance with UDP policies (see Policies H.4.1 and H.5.1), Supplementary Planning Guidance (February 1997) and Think Access – Design for Accessibility (April 2000).

- 7.7 There may need to be new road infrastructure. Redevelopment of the adjacent site, The Indian Gymkhana Club, provides the potential to provide pedestrian, vehicular and cycle access to and through the site. Reconfiguration of the site's Local Open Space may allow for rear access from the site's southern boundary with Kilberry Close and Oakley Close. Detailed assessment work will need to show how routes and access to/through the site would link into the existing road network and impact on air quality, congestion and local residential roads (rat running). Any such proposals should include a Transport Impact Assessment that details the impact of the development on the surrounding transport network and access to the site by foot, cycle, public transport and private car. Dependant on the findings of such an assessment, it may be appropriate to restrict access via particular roads as well as implement traffic and parking measures in the local area in order to mitigate against any negative impact the development may have. Such measures would be subject to consultation with local residents.

Local Open Space

- 7.8 Redevelopment of the site provides the potential for public and private use of the Local Open Space in an area of Publicly Accessible Open Space Deficiency.
- 7.9 Opportunities should be explored for providing for both active and passive recreation, which would be compatible with the appearance and setting of Campion House, the type of surrounding land use, the character and appearance of the Spring Grove Conservation Area, and the other uses proposed on the site. Access arrangements should not result in a loss of amenity to the surrounding residents (e.g. through undue noise and disturbance) or impair the safety of other road and footway users. In addition, it should be noted that the Council will normally require all existing trees of amenity and landscape value to be retained (see UDP Policy ENV-N.2.7).
- 7.10 Adequate security measures will be important and as such it is important the future management of the publicly accessible open space in the future is considered as integral to any development that may take place.
- 7.11 The developer would likely be required to enter into a Section 106 Legal Agreement with the Council in order to ensure adequate management and maintenance of the Local Open Space in the future.

Community and Leisure Use

- 7.12 Any redevelopment of the site should investigate community needs within the area and consider the potential to provide for these.
- 7.13 Investigations should include new leisure development (see UDP Policy C.5.1) and provision for children's formal and informal playspace that is reasonably related to the scale of the proposed residential development (see UDP Policy H.4.4).

Employment and/or Retail

- 7.14 The provision of employment and/or retail floorspace is not considered appropriate in this location having regard to the existing use of the site, the type of surrounding land use and the relevant planning policies.

8.0 PLANNING GUIDANCE

Movement (Pedestrian, Vehicular and Cycle) and Parking

- 8.1 Any redevelopment of the site will generate significant, additional, people movements in the area and the Council wishes to encourage as many of these as possible, that cannot be made on foot or cycle, to be made by public, rather than private transport in accordance with UDP Policies T.1.2 and T.2.1.
- 8.2 Any new development should comply with the Council's car parking standards stated in the UDP, including provision for people with disabilities. It should be noted that these are maximum standards.
- 8.3 Vehicular parking should be conveniently located to buildings on site. All parking areas should be well designed, safe and secure, and landscaped using good quality materials and integrating well with the open character of the site. They should have sufficient surveillance in order to deter crime and car theft.
- 8.4 The level of parking sought will need to be fully justified, taking account of the nature of uses proposed, the overall accessibility of the site and the need to promote access by means such as walking, cycling and public transport. Consideration may need to be given to the existing access arrangement opposite Church Road.
- 8.5 Secure and conveniently located cycle parking should also be provided for any new development in accordance with UDP Policy T.2.4 and the Council's cycle parking standards set out in Supplementary Planning Guidance (February 1997).
- 8.6 Particular attention must be given to the safety and security of pedestrians and the needs of people with impaired mobility in accordance with UDP Policies ENV-B.1.8, ENV-B.1.9, T.1.4 and T.2.2.

Built Form, Design and Layout

- 8.7 UDP Policy IMP.5.1 seeks to encourage high quality building, urban and landscape design to create a sense of place and identity throughout the Borough, with UDP Policy ENV-B.1.1 seeking to ensure that new development makes a positive contribution to overall environmental quality. Therefore, new development should relate well to its site, and the scale, nature, height, massing, character and use of the surrounding land and should minimise any detrimental impact on the adjoining properties.
- 8.8 Any new development should look comprehensively at the built form and new redevelopment proposals should seek to rationalise the siting of buildings. The site would benefit from selective demolition of some of the buildings, which should be replaced by new buildings that are more in keeping with the Building of Local Townscape Character and the Spring Grove Conservation Area.
- 8.9 In assessing development proposals, consideration will be given to the existing built form and heights across and around the site, the need to preserve the setting of Campion House as well as the Grade II listed statue known as Ghost or Descent from the Cross, and the potential impact on the surrounding area and the character or appearance of the Conservation Area.

- 8.10 Generally, three- to four- storey development fronting Thornbury Road would be considered appropriate having regard to the scale of existing development on the site, including Campion House, built at 3½ storeys in height, and the three-storey accommodation block to its south – and based on current floor to ceiling standards. However, any new development should be subordinate to Campion House and building heights sensitive to their surroundings, in particular surrounding residential properties.
- 8.11 The open land in the west of the site should be retained in order to preserve or enhance the character or appearance of the Spring Grove Conservation Area and opportunities should be explored to improve its amenity value and to provide improved public access and usability. It should offer a pleasant environment for people within and outside of the site and, in the event that it becomes publicly accessible, the network of pathways and the provision of lighting, coupled with enhanced opportunities for surveillance from adjoining residential properties, should engender a sense of safety and security.
- 8.12 Opportunities should also be explored to incorporate the existing trees into the layout of any new development and to increase the stock and range of trees on site in order to preserve or enhance the character or appearance of the Conservation Area.
- 8.13 In the event that detached and linked houses are proposed, these should be provided with private useable amenity space.
- 8.14 Important to the long-term image of the site is a high quality of management and maintenance.

9.0 COMMUNITY BENEFITS/PLANNING OBLIGATIONS

- 9.1 Any development of the site granted planning permission may (where appropriate and applicable) be subject to the provision of the following benefits (dependant on the nature and scale of development):
- Affordable housing
 - Environmental improvements (e.g. towards improvements to the pedestrian environment and pedestrian safety)
 - Contributions to traffic management/controlled parking/highway improvements and public transport provision
 - Support services (e.g. education, health, community and children’s play facilities)
 - Local Open Space/public realm and landscaped areas
 - Maintenance agreements for Local Open Space/public realm and landscaping

10.0 SUPPLEMENTARY INFORMATION

10.1 Any planning applications should be accompanied by the following information (dependent on the nature and scale of development):

1. Environmental Impact Analysis may be required
2. Sustainable Development Statement (see also Checklist)
3. Traffic Impact Analysis (see also 2. above)
4. Conservation Area Statement
5. A statement assessing the impact on the Building of Local Townscape Character and the setting of the Grade II statue known as Ghost or Descent from the Cross
6. Open Space Analysis (see also 2. above)
7. Affordable Housing Analysis with particular reference to the G.L.A toolkit
8. Contaminated Land Statement (see also 2. above)
9. Statement of Community Involvement
10. Water Regime Statement (see also 2. above)
11. Tree Survey (see also 2. above)

11.0 THE DRAFT PLANNING POSITION STATEMENT

11.1 A draft Planning Position Statement has been prepared for consultation purposes and is attached as an appendix. Its content reflects the constraints and opportunities of the site, taking account of the site characteristics, planning history, planning issues and all other material planning considerations raised in this report.

11.2 The draft Planning Position Statement provides guidance on the following:

- Land uses; movement and parking; and built form, design and layout – with reference to relevant planning policies and guidance; and
- The planning benefits that the Council will seek to ensure by legal agreement where appropriate and applicable, dependent on the nature and scale of development.

12.0 THE CONSULTATION PROCESS

Consultees

12.1 The following stakeholders/affected parties will be consulted on the draft Planning Position Statement:

- Current owners/occupiers of the site and of neighbouring sites in a defined catchment area (see Map 2);
- Local residents/community groups;
- Development industry representatives;
- Council Members;
- Other departments within the Council; and
- Relevant statutory consultees.

Methods

- 12.2 It is envisaged that the following methods form components of the consultation process:
- Direct mailing to selected individuals (letters, leaflet, draft Planning Position Statement);
 - HM magazine/local press;
 - The Council's website; and
 - Leaflet/mail shot.
- 12.3 Should the response to and/or results from the consultation exercise indicate the need for a public meeting, then one will be held.

13.0 CONTACTS

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