

**Proposed Residential  
Development at  
Former Masonic Hall and Old  
Telephone Exchange, Staines-  
upon-Thames  
Planning Statement**

Inland Ltd

September 2020

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# Appendices

Appendix 1      Affordable Housing Statement

Appendix 2      Draft Heads of Terms



## 1.0 Introduction

- 1.1 This Planning Statement has been prepared by Lichfields on behalf of the applicant, Inland Ltd, to accompany a full planning application for the redevelopment of the Former Masonic Hall and Old Telephone Exchange, Staines-upon-Thames.
- 1.2 The proposed development comprises the following:
- Demolition of the Former Masonic Hall and redevelopment of site to provide 206 dwellings together with car and cycle parking, hard and soft landscaping and other associated works.*
- 1.3 The application site is 0.53ha and currently comprises the now vacant Staines Masonic Hall, associated car parking spaces, cleared land which was the former Telephone Exchange that was demolished in 2016 and highway land required for the proposed public realm improvements. The Masonic Lodge relocated to Twickenham in March 2020, with Inland Homes taking ownership of the site in July 2020.
- 1.4 The proposed development for the application site will provide 206 residential dwellings across two buildings of 13- and 15-storeys, landscaped amenity space and extensive public realm, including enhanced pedestrian links to the town centre. The proposed mix reflects planning policy with a broad breakdown of 50% one-bed dwellings and 50% two-bed along with 48 car parking spaces. No residential floorspace would be provided on the ground floor.
- 1.5 The proposed development has been carefully designed to optimise the site's capacity for residential development, whilst ensuring that the development responds to the existing townscape and context. The proposed development is a high-quality design that sensitively responds to neighbouring buildings and the space around the site, without prejudicing the aspirations of the Council to redevelop the wider area.
- 1.6 Prior to the submission of the planning application, the applicant has engaged in detailed pre-application discussions with the Spelthorne Borough Council (SBC) officers since 2016, on-going discussions with key stakeholders such as the Highways Authority, Environment Agency and the housing and waste departments of the Council in addition to public engagement which took place in March 2020. Throughout the pre-application process the development has involved engagement with the Masterplan, Secured by Design and a Members Briefing. The scheme has evolved in direct response to feedback received at meetings with planning officers from SBC.
- 1.7 This Planning Statement brings together the necessary information to assess the proposal against prevailing planning policy and having regard to any material considerations.
- 1.8 Overall, it is considered that the proposed development is in broad accordance with the adopted and emerging development plans as a whole and would act as a catalyst for wider regeneration in Staines Town Centre in accordance with Council aspirations, while also providing much needed homes in accordance with SBC's emerging spatial strategy.

## Content of the Application

- 1.9 Alongside this Planning Statement, the planning application is accompanied by the following documents:
- 1 Application forms, certificates and appropriate application fee;
  - 2 Architectural Plans;
  - 3 Design and Access Statement (including Site Waste Management Plan);

- 4 Planning Statement (including Affordable Housing Statement at Appendix 1);
- 5 Statement of Community Involvement;
- 6 Heritage Townscape and Visual Impact Assessment;
- 7 Flood Risk Assessment;
- 8 Transport Assessment and Travel Plan;
- 9 Financial Viability Assessment;
- 10 Air Quality Assessment;
- 11 Contaminated Land Survey and Report;
- 12 Noise Assessment;
- 13 Energy and Sustainability Statement, including Renewable Energy Statement;
- 14 Daylight/Sunlight Report;
- 15 Biodiversity Survey and Report;
- 16 Archaeological Impact Assessment; and
- 17 Aviation Impact Assessment.

1.10 The scope of the application has been agreed with officers prior to the submission of the application.

## **Structure of this Statement**

1.11 The structure of this report is as follows.

- **Section 2.0** briefly describes the site and its context and summarises the background to this proposal.
- **Section 3.0** sets out the planning and project history.
- **Section 4.0** provides a description of the proposed development.
- **Section 5.0** identifies the planning policy context and key tests relevant to the determination of the planning application.
- **Section 6.0** contains a comprehensive assessment of the proposed development in planning terms; and
- **Section 7.0** sets out the conclusions.

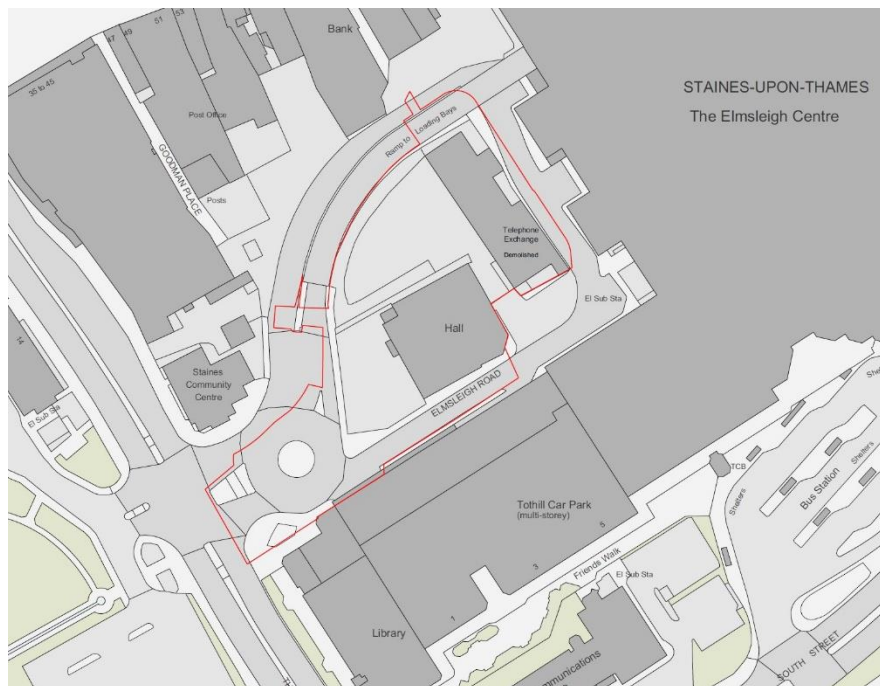


## 2.0 The Site and Surrounding Area

### The Site

- 2.1 The site is located in the centre of Staines-upon-Thames Town Centre, to the south of the High Street and to the east of Thames Street. The River Thames is to the west of the site, beyond the Memorial Gardens.
- 2.2 The 0.53 ha site comprises the former Masonic Hall, a low two-storey structure, and an area of cleared land which previously the Telephone Exchange, a 4/5 storey building. This building was demolished in 2016. The Masonic Hall building, which is located in the western part of the site, was vacated in March 2020, with its functions having been relocated to Twickenham. The site contains car parking spaces and some overgrown shrubs. The application site also includes highway land for proposed public realm improvements.
- 2.3 The site is bound by Elmsleigh Road on all sides. Beyond this the site is adjacent to the rear of properties which front onto the High Street to the north, Elmsleigh Shopping Centre, and its associated servicing ramp to the east, Tothill Multi Storey Car Park to the south and the Staines Community Centre and Thames Street to the west.

Figure 2.1 Site Location Plan



- 2.4 The site is not within a Conservation Area, nor does it contain any Listed Buildings. It is located approximately 150m west of Staines Conservation Area, which incorporates the area of Staines next to the River Thames and a number of listed buildings. The site is located within an area of high archaeological potential, 'Staines Historic Core and Site Of Roman Town'
- 2.5 The site is in Flood Zone 3, which means it has a 1 in 100 or greater annual probability of flooding. It is also located within the Spelthorne Air Quality Management Area ('AQMA'), focusing on nitrogen dioxide.
- 2.6 The site is located within an employment area on the adopted Policy Map (2009) but it is also located in Phase 4 of Site Allocation A10 (The Elmsleigh Shopping Centre and adjoining land) in the Allocations Development Plan Document (2009). Phase 4 of Allocation A10 is for the

extension of the Elmsleigh Centre to the west to include at least 18,000sqm of retail floorspace, a mix of related non-retail uses and approximately 65 flats.

- 2.7 The same wider site is also included in the emerging Draft Allocations Development Plan (2019) (ref. ST4/009). However, in response to the changing market and needs, the focus is now on residential development including the provision of 650 dwellings and the maintenance and potential extension of retail use on the site. The site is also located in the Staines Town Centre Masterplan area, which is in the early stages of preparation.

### **The Surroundings**

- 2.8 The surrounding area is predominately commercial, with the Elmsleigh Shopping Centre on the eastern side, and further retail units to the north along the High Street. Elmsleigh multi-storey car park and Tothill multi-storey car park are also located to the south and east of the site, with Tothill multi-storey car park and the service area of the Elmsleigh Centre accessed from Elmsleigh Road.
- 2.9 To the west of the site are a number of community facilities located along Thames Street, including the Staines Community Centre, Staines Library and Spelthorne Museum. To the west of Thames Street and the site are the Memorial Gardens with the River Thames beyond this.
- 2.10 Staines train station is located approximately 500m to the southeast (c.10 minutes walking distance from the site), providing direct services to London Waterloo, Reading and Weybridge. The nearest bus stops to the site are located approximately 150m walking distance north-west of the site along the A308 providing regular services to Slough, Heathrow Airport, and Woking. Further to this, Elmsleigh bus station is located approximately 300m walking distance to the south of the site.
- 2.11 The Staines Memorial Gardens are located approximately 280m to the west of the site. There is also existing public open space, known as Lammas Recreation Ground, within 800m distance of the site which is well maintained and includes a range of play amenities for all ages.

### **Development sites in the surrounding area**

- 2.12 The following development sites have been identified as significant residential-led proposals that have come forward in recent years within Staines. They are therefore useful examples of the emerging context of the town.
- 1 **Thameside House** (20/00344/FUL) - Application for the demolition of existing office block and erection of 140 residential units in two buildings (up to 15 storeys), with flexible commercial and retail space, associated landscaping, parking and ancillary facilities. This proposal includes provision for no affordable housing. It was submitted in March 2020 and has not yet been determined.
  - 2 **Charter Square** (ref. 17/01923/FUL) – Application for redevelopment of the site to provide 104 new residential units with flexible commercial floorspace (flexible A1, A2, A3 and B1 Class uses) at ground and first floor; the creation of pocket park and landscaped areas; with associated parking and highway works. This application was submitted by London Square and was approved in February 2019. It includes heights up to 14 storeys.
  - 3 **17-51 London Road** (ref. 19/00290/FUL) – Application for erection of six buildings to provide 467 residential homes (Use class C3) and flexible commercial space at ground and first floors (Use Classes A1-A3, B1a, D1 or D2), car parking, pedestrian and vehicle access, landscaping and associated works. This application was submitted by Berkeley Homes and was approved in July 2019. This application included heights up to 14 storeys.

- 2.13 We are also aware of neighbouring sites expected to come forward for redevelopment including residential provision in the future, such as the Debenhams store, Thames Lodge and Riverside car park which are allocated in the emerging local plan. The site and surrounding area are also subject of the emerging Staines Town Centre Masterplan. As such it is recognised that the area is likely to see significant change in the future as masterplan proposals are realised.

## 3.0 **Background**

### **Planning History**

- 3.1 A planning application (ref. 14/01377/FUL) for the site, comprising the demolition of the Masonic Hall and Old Telephone Exchange and redevelopment of the site to create 140 residential units, a 102-bedroom hotel, mixed use commercial floorspace and the re-provision of a masonic lodge was refused planning permission in February 2015. In summary, the reasons for refusal were as follows:
- 1 The proposal was considered to represent a piecemeal form of development that would preclude the future comprehensive development to extend the Elmsleigh Shopping Centre to provide at least 18,000sqm of retail floorspace and other associated development.
  - 2 The proposed development in terms of its design, scale and location, is considered to have insufficient regard to the character of the surrounding area and will be visually obtrusive.
  - 3 The proposal is considered to provide an unacceptable standard of amenity for the future occupiers of the residential units in terms of poor outlook insufficient levels of daylight/sunlight, and inadequate internal floorspace.
  - 4 The proposal would provide inadequate affordable housing.
  - 5 The site is located within Flood Zone 3a and will result in an overall decrease in flood storage capacity. The applicant has not proposed any mitigation measures to alleviate the increase in built footprint on the site and the development will therefore lead to an unacceptable increase in flood risk elsewhere.
  - 6 The proposal did not demonstrate to the satisfaction of the County Highway Authority that the proposed development is compatible, or could be compatible with suitable mitigation measures.
  - 7 The proposal failed to demonstrate that at least 10% of the development's energy demand could be achieved from on-site renewable energy sources.
  - 8 The proposal would result in a more intensive use of the nearby public open space of the Memorial Gardens and the applicant has not proposed financial contribution towards improving the existing recreational facilities.
- 3.2 Through extensive pre-application discussions with SBC officers and the preparation of this planning application, it is considered that all of the above reasons for refusal have been addressed. This is covered in the details provided in Section 6.0.

### **Consultation on Application Proposals**

- 3.3 In accordance with the National Planning Policy Framework (NPPF), the proposed development has been subject to early engagement with the Council, key stakeholders and the local community prior to the submission of this application. This consultation has influenced the emerging design proposals and informed the scheme now submitted to the Council for its determination.
- 3.4 A number of meetings have been held with SBC planning officers to progress the proposed development through the pre-application process.
- 3.5 An initial informal pre-application meeting was held in October 2019 to discuss the principle of bringing the site forward for development and to introduce the project team.

### **Pre-Application Meeting (November 2019)**

- 3.6 The first formal pre-application meeting was held on 27<sup>th</sup> November 2019 where initial design proposals were presented to officers for comments.
- 3.7 The initial scheme included the provision of 216 units (all with balconies or terraces) across two buildings (16 and 13 storeys), a large central landscaped podium space at first floor accessible to all residents and 54 car parking spaces located at ground floor below the podium.
- 3.8 SBC officers were generally supportive of the delivery of residential accommodation in this location, given its sustainable brownfield location, but noted that the adopted site allocation would need to be considered and addressed.
- 3.9 A summary of the key points received from SBC include:
- There were concerns about this scheme being submitted prior to the New Local Plan and the Staines Masterplan being adopted.
  - Further visualisations of the scheme from surrounding views to demonstrate how it will sit in the wider context were requested.
  - Pedestrian linkages and public realm enhancements should be a priority in bringing the site forward for development.
  - Clarification in relation to car parking provision and discussion with Surrey County Council Highways officers was recommended to agree the level of provision required.
  - It was also identified that consideration should be made for the Heathrow safeguarding heights.

### **Pre- Application Meeting (January 2020)**

- 3.10 A second pre-application meeting took place on 24<sup>th</sup> January 2020. A summary of the scheme development is outlined below:
- 206 dwellings across both buildings, including a mix of 1- and 2-bed units
  - Reconfigured highway to the junction of Thames Street
  - Enhanced public realm at ground floor to complete footpath around site
  - Buildings reduced to 15 and 13 storeys in consideration of Heathrow safeguarding heights
- 3.11 Formal written feedback was received from SBC on the 28<sup>th</sup> February 2020.
- 3.12 A summary of the key points received from SBC include:
- Officers reiterated that submission of a planning application could be considered to be premature due to the early stages of the Local Plan.
  - Support was given by officers in favour of the scheme's proposed new pedestrian linkages and new public landscape both within and surrounding the site. It was noted that the proposals for walkway under the existing ramp would need to be inviting.
  - It was confirmed that SBC cannot currently demonstrate a five-year housing land supply which would be a consideration in determining a planning application for the site.
  - A dry means of escape from the site to an area outside the floodplain would need to be demonstrated for the proposed development to be considered acceptable from a flood risk perspective.
  - Parking provision was considered to be low, however the location of the site in the town centre would be taken into consideration due to the close proximity to the bus and train

station. Discussions had been had separately with Surrey County Council's Highways Team who considered that the provision of parking was acceptable.

- The proposed cycle provision was confirmed to be acceptable.
- The bin storage provision was also considered to be acceptable, following discussions with the Neighbourhood Services officer.

### **Pre- Application Meeting (July 2020)**

3.13 A third pre-application meeting took place on 28<sup>th</sup> July 2020. The purpose of this meeting was to confirm the approach in relation to the proposed public realm improvements and further design matters

3.14 A summary of the scheme development is outlined below:

- 206 dwellings, comprising 105 1-bed units and 101 2-bed units (all meeting building regulation M4(2) standards)
- 46% affordable housing
- 965sqm of communal amenity space at podium level, including children's play space
- A biodiverse roof
- 208 cycle spaces
- 48 parking spaces (including eight wheelchair spaces), two car club spaces and service bays

3.15 A summary of the comments and discussions which took place in the meeting are included below:

- Officers queried the acceptability of the residential amenity of dwellings facing Tothill Multi-Storey Car Park. However, it was confirmed that a number of design initiatives have been implemented to ensure that residents have a good level of amenity, including the design of the balconies which should allow residents to have a wider outlook including views of the River Thames.
- The proposed material palette was queried by SBC and the design team confirmed that a sample of the lighter coloured brick could be provided to demonstrate it is more of a warm tone.
- It was confirmed that discussions had taken place with the housing officer who suggested the provision of 2b4p units instead of 2b3p due to identified need, but confirmed that the tenure split was acceptable. SBC planning officers agreed that the mix was acceptable.
- SBC requested that the wider area, including public realm proposals should be included in red line boundary of the site, to support the justification of the pedestrian linkages. It was confirmed that no proposals were included on third party land and that anything on highways land is considered deliverable but that discussions were being had with SCC Highways to confirm this.

### **The Local Community**

3.16 The proposals have also been subject to a thorough and detailed public consultation programme including two days of public consultation events which took place on the 13<sup>th</sup> and 14<sup>th</sup> of March 2020.

3.17 Activities included:

- 1 Invitations distributed to nearby residents, stakeholders, business owners and the media outlining the proposals and advertising the public consultation events on Friday 13th March and Saturday 14th March.
- 2 Engagement and meetings with key stakeholders groups, ward and senior cabinet councillors and council officers, informing them of the proposals and the public consultation process.
- 3 A fully staffed and widely publicised public consultation event at the Staines Community Centre, Thames Street, Staines-upon-Thames, TW18 4EA. This event included a stakeholder preview between 5.15pm – 5.45pm on Friday 13th March and on Saturday 14th March between 9.30am - 10.30am and the main public event between 5.45pm - 9pm on Friday and between 10.20am - 2.00pm on Saturday.
- 4 A dedicated freephone consultation telephone line, email address and freepost address were also available to ensure stakeholders and the public could easily contact the development team.

- 3.18 Across the consultation period, a total of 13 people (including two councillors) attended the event and eight feedback forms were collected during the event, no further forms were received by post after the event. Overall, there was a strong recognition among stakeholders and residents that the proposals represented an improvement on existing site.
- 3.19 Full details of the local community events and responses received and responded to are included within the Statement of Community Involvement.

## **Summary**

- 3.20 The proposed development is the culmination of an extensive and constructive pre-application consultation with SBC and the local community. The resultant scheme for the site comprises a well-conceived and supportable proposition in planning terms and will deliver regeneration benefits in the form of housing, including a high percentage of affordable housing.

## 4.0 **Proposed Development**

- 4.1 This section provides a description of the proposed development. A detailed description of the proposal is also set out in the submitted Design and Access Statement.

### **Land Use**

- 4.2 The proposed development comprises the demolition of the Former Masonic Hall and redevelopment of the site including the cleared land that the former Telephone Exchange previously occupied to deliver residential dwellings (C3), as well as new areas of public realm, landscaped amenity space and car and cycle parking. The proposal consists of two dynamic buildings that are joined at ground floor by a generously landscaped podium.
- 4.3 The proposal includes the provision of 206 new residential dwellings, comprising a mix of one- and two-bed units across two buildings of 13 and 15 storeys. Block A is 15 storeys and contains market dwellings and Block B is 13 storeys and contains affordable dwellings.
- 4.4 The buildings are connected by a first floor podium comprising communal amenity space which includes a variety of planting and play space provision. All units are provided with private amenity space in the form of balconies and terraces.
- 4.5 Car and cycle parking spaces are provided at ground floor level below the podium, with car club spaces and service bays included in laybys to the east and south of the built development. Plant and refuse stores will also be located at ground floor level below the podium.

### **Layout, Height and Massing**

- 4.6 Through formal discussions with planning officers at SBC, the scheme has been developed to respond to the surrounding area. This has resulted in a scheme comprising of two blocks of 13 and 15 storeys in height.
- 4.7 The 13-storey tower is located in more northern part of site (Block B) and the 15-storey block is located in the southern part of the site (Block A). The blocks are positioned to the north-east and south-west corners of the site to maximise central amenity space and ensure good residential amenity and outlook.
- 4.8 The proposed height of the two buildings does not exceed 68m (15 storeys). An Aviation Impact Assessment has been completed which concluded that the proposed development would not infringe the OLS at Heathrow Airport.
- 4.9 The height and massing of the development has been informed by a detailed review of the site's context and setting. The immediate surrounding area has a predominately commercial character which is reflected within the design proposals. A change in materiality has been used on the top three floors of each building to provide a visual break and celebrate the building form. The density of the development is 624 dwellings per hectare. The ground floor level would contain an external landscaped link around the site to improve pedestrian access. The ground floor level also provides a dry means of escape north of the high street in the event of flooding. There are no residential units at ground floor level.
- 4.10 Car and cycle parking, plant, ancillary and refuse stores are located at ground floor level below the podium.
- 4.11 The first floor podium level can be accessed from both blocks. This level contains amenity space and landscaping. Residential dwellings located a podium level have their own private terrace with defensible space. Dwellings on upper floors benefit from private balconies.



## Materials

- 4.12 The development would complement the surrounding area. The materials include red brick and hit and miss red and buff brick, along with white glazed brick and metal window frames and balustrades. Block A is proposed to be red brick and Block B is proposed to be buff brick.
- 4.13 Further details are included in the Design & Access Statement.

## Quantum, Tenure and Dwelling Mix

- 4.14 As stated above, the proposed development is for the delivery of 206 residential dwellings comprising 1- and 2-bed units as follows:

Table 4.1 Housing Mix

Unit Type	Number	Percentage
1 bed	105	51%
2 bed	101	49%
Total	206	100%

- 4.15 A mix of different tenures is also proposed, including market units, shared ownership and affordable rent. The following tenure breakdown is proposed:

Table 4.2 Proposed Tenure

Unit	Private		Shared Ownership		Affordable Rent	
	No.	%	No.	%	No.	%
1-bed	57	51%	17	49%	31	53%
2-bed	55	49%	18	51%	28	47%
<b>Total</b>	<b>112</b>	<b>54%</b>	<b>33</b>	<b>16%</b>	<b>61</b>	<b>30%</b>

- 4.16 This results in an overall provision of 46% affordable housing. The proposed tenure split for the affordable housing is 65% affordable rent and 35% shared ownership. All flats have been designed to comply with the minimum space standards.

## Access, Servicing and Parking

- 4.17 Parking and cycle stores are located at ground floor, beneath the podium. Primary vehicular access is via Thames Street with access into the car parking area via Elmsleigh Road on the eastern side of the site.
- 4.18 The proposal includes 48 parking spaces (including 8 wheelchair accessible spaces), 220 cycle spaces (including 12 short stay spaces for visitors within the public realm), 6 motorcycle spaces and 2 car club spaces.
- 4.19 Pedestrian access to the site would be via Elmsleigh Road to the north coming from the High Street with one residential entrance located on the northern side of Block B and a secondary residential entrance located to the west of the site for Block A Both blocks can access the landscaped amenity space at the podium level via communal first floor access in the southern part of Block A and the northern part of Block B.
- 4.20 Improvements to Elmsleigh Road are proposed to enhance the pedestrian provision and public realm in the vicinity of the site. The road width will be reduced to allow for widened footways and loading bays, and informal crossings will be provided at pedestrian desire lines.
- 4.21 The improvements also include proposed alterations to the existing Elmsleigh Road / A308 Thames Street junction to provide improved pedestrian connections around the site and to

Riverside. This will be achieved through the removal of the Elmsleigh Road roundabout, with associated changes to the signalised junction.

- 4.22 Block A is proposed to have 50 bins and 16 food bins, and Block B is proposed to contain 41 bins and 11 food bins. As part of the alterations to Elmsleigh Road, two servicing bays will be provided to enable refuse collection and servicing from both of the building cores. The loading bays will be designed as reinforced footway to dissuade unauthorised use.

## **Landscaping, Amenity and Residential Environment**

- 4.23 As previously stated, it is proposed that the junction of Elmsleigh Road and Thames Street would be amended to make it more efficient. This would free up space for significant public realm improvements for pedestrians and nature and increasing the greening of this area, which currently has limited landscape and ecological value and predominately comprises concrete/tarmac and buildings. Planting is also proposed around the ground floor where the car park is located. This will include climbers which will create the feeling of continuous green space from the landscaped podium across to the new junction and beyond to the Memorial Gardens.
- 4.24 Within the proposed residential area, it is proposed that to include a pocket park with lawn and wildflowers. This would include small trees placed to frame the space, taking into account below ground services. The proposed podium garden comprises 965sqm of amenity area on podium garden, including 271sqm of playable landscape. The podium garden would provide residents' communal amenity space with soft landscape buffers around the edge and allowing views towards the Thames. The garden would also include children's play space for young children and seating areas of residents to relax and socialise in.
- 4.25 The playable space would be incorporated throughout the podium garden and public realm and will be suitable for all age groups and encourage a sense of community and enjoyment throughout the scheme. In addition, a dedicated area specifically designed for under 5s is included on the podium garden.
- 4.26 The proposal will improve the overall ecology and biodiversity of the site through introducing landscaping proposals which include plants chosen for their contribution to pollinators, birds and butterflies. Bird nest boxes will be included on the eastern green wall to encourage nesting of native birds. Sensory and brightly coloured flowers will be included to encourage interaction from residents and the public with nature.
- 4.27 More details of the proposed landscape, amenity space and residential environment are set out in the submitted Design and Access Statement.

## 5.0 Planning Policy Context

5.1 This section identifies the planning policy and guidance at national and local level relevant to this proposal. It then identifies key planning considerations against which the planning application will be determined.

### 5.2 National Planning Policy Framework (2019)

5.3 The National Planning Policy Framework (NPPF, 2019) sets out the Government's planning policies for England. It is a material planning consideration in decision making. The NPPF requires Local Planning Authorities (LPAs) to adopt a positive approach to decision taking and to apply a presumption in favour of sustainable development

5.4 The aim of the NPPF is to proactively deliver sustainable development to support the Government's housing and economic growth objectives and meet the needs of the country. Paragraph 8 sets out the three dimensions of sustainable development: 'economic' to help build a strong and competitive economy; 'social' to support strong communities and ensuring that a sufficient number and range of homes to meet the needs of present and future generations; and 'environmental' in protecting and enhancing the environment.

5.5 Paragraph 11 of the NPPF requires LPAs to apply a presumption in favour of sustainable development, and to approve sustainable developments without delay. It states:

*"For decision-taking this means:*

*approving development proposals that accord with an up-to-date development plan without delay; or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless: The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole...."*

5.6 Paragraph 59 supports the objective of significantly boosting the supply of homes and for a sufficient and variety of land comes forward where it is needed. The size, type and tenure of housing needed for different housing groups should be assessed and reflected in policy as well as the need for affordable housing. Paragraph 63 goes on to support the re-use of brownfield land.

5.7 Chapter 9 of the NPPF promotes sustainable transport. In paragraph 103, it is stated that 'significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes'.

5.8 Paragraph 124 states that *"good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities"*. Several key principles are identified for achieving good design, including:

- to function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- be visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- to be sympathetic to local character and history, including the surrounding built environmental and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

- establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- to optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- to create places that are safe, inclusive and accessible and which promote health and wellbeing, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

5.9 In paragraph 174 of the NPPF, it states that LPAs should aim to conserve and enhance biodiversity when determining applications. Paragraph 175 sets out several principles that should be applied. One of the principles is that ‘opportunities to incorporate biodiversity improvements in and around developments should be encouraged’.

5.10 The effect of development on heritage assets is considered in Chapter 16 of the NPPF. Local planning authorities should take account of the desirability of new development making a positive contribution to local character and distinctiveness of the historic environment and the desirability of putting heritage assets to viable use (para 192).

5.11 Paragraph 155 of the NPPF states that development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

### **Statutory Development Plan**

5.12 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that regard is to be had to the Development Plan for the purpose of any determination to be made under the Planning Acts and that the determination should be made in accordance with the Development Plan unless material considerations indicate otherwise.

5.13 The statutory development plan for SBC comprises:

- 1 Saved Policies of the Local Plan (2001)
- 2 Core Strategy and Policies DPD (2009)
- 3 Allocations DPD (2009)
- 4 Proposals Map (2009)

### **Saved Policies of the Local Plan (2001)**

5.14 Most of the policies within the Local Plan 2001 have been superseded. However Saved Policy BE25 requires that development within areas of high archaeological potential will require an initial assessment of the archaeological value of the site to be submitted as part of any planning application. As a result of this a number of works such as field evaluation may be required to ensure any remains of value are identified and preserved.

### **Core Strategy and Policies Development Plan Document (2009)**

5.15 The Core Strategy and Policies Development Plan Document (CS sets out the Council’s overall approach to future development in Spelthorne. The vision in the CS states that by 2026 Spelthorne will have become a more sustainable place to live and work, the economic and social

needs of all residents will be met and the environment will have been successfully protected and where possible enhanced. As the Council does not currently have a five year housing land supply, the relevant policies of the Development Plan are considered to be out of date and the tilted balance would apply with a presumption in favour of sustainable development. Nevertheless, these are set out below to provide a comprehensive overview of the policies in the development plan that could be applied to development on this site.

- 5.16 Strategic Policy 1 (Location of Development) sets out that all new development will be made within the existing urban area. It is noted that the focus on urban areas means making effective use of land within urban areas for development. Therefore 100% of new housing should be on previously developed land.
- 5.17 Strategic Policy 2 (Housing Provision) sets out that within the overall total of housing delivered the Council will require a mix of tenure, size and type to meet identified housing needs, including provision to meet the needs of vulnerable groups. It will seek to ensure that 40% of the total housing provision is in the form of affordable housing. The requirement to meet the housing requirement set out in the Regional Spatial Strategy that this policy requires is not out-of-date, with the introduction of the standard method for calculating housing need introduced by the NPPF (2019).
- 5.18 Policy HO1 (Providing for New Housing Development) states that the Council will ensure provision is made by promoting the development of specific sites for housing through documents including Allocations DPDs, and encouraging housing development, including for redevelopment and infill on all sites suitable for that purpose taking into account other policy objectives and encouraging the redevelopment for housing of poorly located employment land provided the site is suitable for housing.
- 5.19 Policy HO3 (Affordable Housing) sets out that 40% of all net additional dwellings completed over the plan period should be affordable. The Council will seek to maximise the contribution to affordable housing provision from each site having regard to the individual circumstances and viability, including the availability of any housing grant or other subsidy, of development on the site. The Council will seek up to 50% of housing on sites to be affordable where the development comprises 15 or more dwellings (gross) or the site is 0.5 hectares or larger irrespective of the number of dwellings.
- 5.20 Policy HO3 also notes that provision within any one scheme may include social rented and intermediate units, subject to the proportion of intermediate units not exceeding 35% of the total affordable housing component. Meanwhile, Policy HO4 (Housing Size and Types) states that developments will be required to include at least 80% of their total as one or two bedroom units, encouraging the provision of housing designed to meet the needs of older people and encouraging the inclusion within housing schemes of a proportion of dwellings that are capable of meeting the needs, as occupiers, of people with disabilities.
- 5.21 Policy HO5 (Density of Housing Development) states that within Staines town centre development should generally be at or above 75 dwellings per hectare. SBC also note that higher density development may be acceptable where it is demonstrated that the development complies with design policies.
- 5.22 Strategic Policy SP4 (Town Centres and Retail Development) states the Council will ensure that town centres and local centres remain the focus for retailing in the Borough. Improvements in access to the town centre, particularly by non-car-based modes will be encouraged.
- 5.23 Policy EM1 (Employment Development) states that the Council will maintain employment development by retaining designated Employment Areas and supporting in principle proposals in these areas for employment development such as, Staines town centre.

- 5.24 Policy TC1 (Staines Town Centre) states that the Council will maintain the role of Staines as the principal town centre serving north Surrey by encouraging developments that contribute to the vitality and viability of the centre and are of a scale and character appropriate to its role.
- 5.25 Policy CO3 (Provision of Open Space for New Development) requires any new housing proposed in areas of the Borough with inadequate public open space, or where provision would become inadequate because of the development, to include the provision of new on-site open space or a financial contribution towards the cost of new off-site provision. In new housing developments of 30 or more family dwellings the Council will require a minimum of 0.1ha of open space to provide for a children's play area.
- 5.26 Strategic Policy 6 (Maintaining and Improving the Environment) states that the Council will seek to maintain and improve the quality of the environment by ensuring the design and layout of the new development incorporates principles of sustainable development and creates an environment that is inclusive safe and secure, is attractive within its own distinct identity and respects the environment of the area in which it is situated.
- 5.27 Policy EN1 (Design of New Development) states that the Council will require a high standard in the design and layout of new development. Proposals for new development should demonstrate that they will create buildings and places that are attractive with their own distinct identity, they should respect and make a positive contribution to the street scene and the character of the area in which they are situated, paying due regard to the scale, height, proportions, building lines, layout, materials and other characteristics of adjoining buildings and land.
- 5.28 Policy EN1s also requires dwellings to be designed so that they are accessible to all members of the community regardless of any disability and to encourage sustainable means of travel, incorporate landscaping to enhance the setting of the development and create a safe and secure environment in which the opportunities for crime are minimized.
- 5.29 Policy LO1 (Flooding) ensures that developments seek to reduce flood risk and its adverse effects on people and property in Spelthorne. This will be achieved by incorporating a number of measures such as:
- 1 Requiring all development proposals within Zones 2, 3a and 3b to be supported by an appropriate Flood Risk Assessment;
  - 2 Reducing the risk of flooding from surface water and its contribution to fluvial flooding by requiring appropriate sustainable drainage schemes;
  - 3 Maintaining flood storage capacity within Flood Zone 3 by refusing any form of development on undeveloped sites which reduces flood storage capacity or impedes the flow of flood water; and
  - 4 Requiring any development in Zones 2, 3a and 3b to be designed to be flood resilient/resistant.
- 5.30 Policy EN8 (Protecting and Improving and Landscape and Biodiversity) sets out the Council's policy on protecting and improving landscape and biodiversity which they will seek to do by ensuring new development, wherever possible, contributes to an improvement in the landscape and biodiversity and also avoids harm to features of significance in the landscape or of nature conservation interest. Policy EN6 (Conservation Areas, Historic Landscapes, Parks) states that the Council will seek to preserve and enhance the character of conservation areas.
- 5.31 Policy CC3 (Parking Provision) states that Council will have regard to the anticipated demand for parking arising from the use proposed, or other uses to which the development may be put without needing planning permission and the scope for encouraging alternative means of travel

to the development that would reduce the need for on-site parking. This will be particularly relevant in areas well-served by public transport.

### **Allocations Development Plan (2009)**

- 5.32 The site is currently included within Allocation A10 for the Elmsleigh Centre and adjoining land in the Allocations DPD (2009). The Allocations DPD proposes that development takes place in two phases. The site is located in Phase 4 (2019-2024), which is for the extension of the Elmsleigh Centre to the west to include at least 18,000sqm of retail floorspace, a mix of related non-retail uses, approximately 65 flats, additional parking and revised access and servicing arrangements.

## **Emerging Planning Policy**

### **Draft Local Plan - Issues and Options (2019)**

- 5.33 SBC is currently preparing a new Local Plan and a Regulation 18 on Issues and Options took place between November 2019 and January 2020. The next stage of consultation will take place in January and February 2021 with adoption of the Local Plan proposed to be March 2022. Once finalised and adopted, this will replace the current Local Plan, comprising the Saved Local Plan policies (2001) and the Core Strategy and Development Management Policies (2009) and the Allocations Development Plan (2009).
- 5.34 Due to the draft Plan being in the early stages of preparation, the policies can only be given limited weight in the consideration of this application. However, it does provide a clear indication of the direction of travel that SBC are seeking to achieve in terms of the spatial strategy, housing growth and the role of the town centre. The key policies are therefore outlined below.
- 5.35 Draft Policy SP1 identifies Staines-upon-Thames as a key location for housing growth, recognising its sustainable location in close proximity to London and Heathrow Airport. The policy states that guidance for how the town grows sustainably and coherently will be provided within a new Masterplan for Staines to deliver development to meet need. This policy also sets out that tall buildings will be designed to reflect the redefined character of Staines. Design should be of high standard and it is also recognised that there are opportunities for attractive riverside development and public realm enhancement. Improved access will be encouraged in order to maximise the asset that is the River Thames location.
- 5.36 Draft Policy H1 requires new residential development to deliver a wide choice of homes to meet a range of accommodation needs. New development should provide a mix of housing tenures, types and sizes appropriate to the size, characteristics and location. SBC will expect development proposals to contribute to meeting identified housing needs by providing a housing mix as set out in the Strategic Housing Market Assessment or any similar evidence for market and affordable units. All new residential development across all tenures will be expected to meet with the minimum space standards.
- 5.37 Draft Policy H1 also sets out that all new build dwellings will, as a minimum, be constructed in accordance with the requirements of Building Regulations Part M4 (2) and any subsequent updates, unless it can be demonstrated that it is unfeasible to do so. Unless it can be demonstrated that it is unfeasible to do so, in major residential schemes, at least 10% of dwellings will be constructed in accordance with the requirements of Building Regulations Part M4 (3) and any subsequent updates.
- 5.38 Draft Policy H2 requires at least 40% affordable housing units on all schemes of 10 units or more. The tenure and number of bedrooms of the affordable homes provided on each qualifying

site must contribute towards meeting the mix of affordable housing needs identified in the Strategic Housing Market Assessment or subsequent affordable housing needs evidence. This currently includes a tenure split of 75% affordable/social rent, with the remainder being other forms of affordable housing. A minimum of 10% of the homes provided on each site must be available for affordable home ownership, except where an exemption applies in the NPPF.

- 5.39 Draft Policy ID2 identifies that the Council will expect development proposals to facilitate sustainable and active modes of travel. This will be achieved by provision of, or contributions towards, the improvement of public and community transport, provision of vehicle parking standards, as set out in the Council's latest Parking SPD, and the provision of electric vehicle charging points which are set out in the latest Surrey County Council guidance (replicated below). SBC will also require provision of secure, accessible and convenient on-site cycle parking on site.
- 5.40 Draft Policy DS1 details how the Council will require a high standard in the design and layout of new development. Proposals for new development should demonstrate that they will create buildings and places that are attractive with their own distinct identity, respect and make a positive contribution to the street scene and the character of the area in which they are situated and pay due regard to the scale, height, proportions, building lines, layout, materials and other characteristics of adjoining buildings and land.

#### **Draft Site Allocations (2019)**

- 5.41 The site is allocated as part of the wider Elmsleigh Centre and adjoining land allocation (Site ID ST4/009). The draft allocation has significantly increased the amount of residential development for the area and reduced need for retail provision overall for the wider site to reflect the changing market and local needs. The site is now proposed to be allocated for mixed commercial and residential uses including 650 residential units, with the retention of, and possibly extension of retail uses on the site.

#### **Other Material Considerations**

- 5.42 In addition to the Statutory Development Plan and emerging draft policy, the following documents are considered relevant and material in determining its application:

- 1 National Planning Policy
  - a National Planning Policy Framework
  - b Planning Practice Guidance ('PPG') (CLG; 2014, 2017, 2018 and 2019); and
  - c Nationally Described Standards.
  - d National Design Guide
- 2 Local Guidance (LBS)
  - a Design of Residential Extensions and New Residential Development SPG (2011)
  - b Spelthorne Parking Standards (2011)
  - c Surrey County Council - Vehicular and Cycle Parking Guidance (2018)
  - d Flooding SPD (2012)
  - e Housing Size and Type SPD (2012)

#### **Parking Requirements**

- 5.43 The minimum car parking standards for residential developments required in the Spelthorne Parking standards (2011) are as follows:



Table 5.1 Residential Parking Requirements

Type of Dwelling		Car Parking Spaces per dwelling	Cycle Parking Per Dwelling
Private	1 bed	1.25	1
	2 bed	1.5	1
Affordable	1 bed	1	1
	2 bed	1.25	1

5.44

The Surrey County Council parking requirements (2018) require electric vehicle charging points. For residential development of flats, the requirement is to have 20% of available spaces fitted with a fast charge socket and a further 20% of available spaces to be provided with power supply to provide additional fast charge socket.

## 6.0 **Planning Policy Assessment**

6.1 The relevant planning issues which have been considered include:

- 1 Principle of development;
- 2 Urban design – including layout, legibility, height and scale, townscape and visual impact;
- 3 Housing – including quantum, mix and tenure;
- 4 Accessibility and Inclusive Design;
- 5 Residential Amenity and Open Space;
- 6 Density;
- 7 Parking and Access;
- 8 Flooding;
- 9 Energy, sustainability and overheating;
- 10 Archaeology; and
- 11 Air quality

### **Principle of Development**

6.2 The site is a vacant brownfield site, following the demolition of the Telephone Exchange in 2016 and the relocation of functions of the Staines Masonic Hall to Twickenham in April 2020.

6.3 The site is part of a wider allocation, identified in the Adopted Local Plan, as being appropriate for mixed-use development, including 65 flats and 18,000sqm of retail within Phase 4 (which the site is located within).

6.4 However, as a reflection of the changing market and changing needs, the draft Local Plan Preferred Options Site Allocations document (November 2019) includes the site as part of an allocation for mixed commercial and residential uses, comprising approximately 650 residential dwellings and the retention and possible expansion of retail floorspace. Moreover, the emerging Local Plan identifies Staines town centre as a key focus for growth, in particular to assist in meeting SBC's housing needs.

6.5 SBC are proposing to develop a Staines Masterplan which will set a clear vision and strategy for the transformation and regeneration of the centre of Staines. The current proposals for the application site have taken the emerging masterplan into consideration having regard to the form overlooking, amenity, daylight and sunlight, layout and separation distances. As such the scheme has been designed so that it would not prejudice the masterplan or neighbouring developments which come forward.

6.6 The proposed development will deliver 206 new homes which would make a significant contribution to the housing need in SBC. It is able to deliver housing in the short term and would contribute to the regeneration of a sustainable brownfield site. Through Pre-Application discussions, SBC officers confirmed that a 5YHLS cannot be demonstrated. As such, this site presents an opportunity to deliver a significant proportion of housing to assist in meeting this need.

6.7 The adopted allocation for the site supports it as suitable for residential development, while it is now recognised through the emerging allocation that the need for retail floorspace is significantly reduced. This location is therefore identified to deliver a significant source of new housing for the District. It is noted that the emerging Local Plan is at the early stages of

preparation, but adoption is not expected until March 2022. It is also noted that the Council has commissioned work on a masterplan for the Town Centre. As a consequence, officers initially raised concerns about prematurity.

- 6.8 In response to this, the applicant has fully engaged with officers to demonstrate that development of the site coming forward now would not prejudice the allocation in the draft Plan or the Masterplan for the wider area. The applicant supports the masterplan aspirations for the town centre and has actively engaged with the masterplanners. The application includes significant public realm enhancements in the area and improved pedestrian links and would, therefore, act as a catalyst for much needed new development coming forward in the town centre. The proposed development will therefore enhance and not prejudice the prospects of delivering high quality development in the area which is line with the policies of the development plan.
- 6.9 The NPPF requires the effective use of land in meeting housing need, and in particular making optimum use of accessible, previously developed land. The site is a previously developed site and is in a highly accessible location in the Town Centre of Staines. This is therefore an important material consideration in the determination of this application as it supports the presumption in favour of sustainable development. The proposed residential development is therefore consistent with the NPPF and emerging Local Plan policies.

### **Retail Provision**

- 6.10 It is noted that the allocation in the adopted Plan, which covers this site, includes the provision of 18,000sqm of new retail floorspace, while the emerging allocation for this site only requires the maintenance and *possible* extension of retail uses (our emphasis). This is because, it has been identified through the Council's evidence base, that there has been a significant reduction in demand for additional retail floorspace in Staines and this position was confirmed by officers during pre-application discussions.
- 6.11 While the proposed development does not propose the retail floorspace identified in the adopted plan, the emerging Local Plan demonstrates a clear direction of travel away from this. Meanwhile, the importance of delivering housing in Staines and on the Elmsleigh Centre allocation has been emphasised in the emerging Plan. As a result, it is concluded that retail floorspace in this location is no longer needed.

### **Summary on Principle of Development**

- 6.12 As set out in their Housing Delivery Test Action Plan (July 2019), SBC cannot currently demonstrate a five-year housing land supply (paragraph 2.10). This was also confirmed by the Council through pre-application discussions. As such, the most important policies for determining the application are considered to be out-of-date, in accordance with footnote 7 of the NPPF and therefore paragraph 11(d) of the NPPF applies whereby:

*“where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*

- (i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
- (ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework as a whole.”*

- 6.13 SBC officers previously raised concerns that an application for this site should come forward following the adoption of the Staines Town Centre Masterplan. However, it is clear that housing

is urgently needed in Spelthorne and this site provides an opportunity to deliver this as soon as possible in line with emerging policy aspirations.

- 6.14 As set out in the following subsections, the proposed development has been carefully considered to ensure that it does not prejudice the wider development of Staines through the future masterplan. The site would assist in meeting Spelthorne's housing need and would deliver a significant proportion of the 650 dwellings allocated for the wider area on a key site within the allocation. In addition, the site coming forward early would support the allocation and masterplan, giving the Council certainty.

## **Urban Design**

- 6.15 Policy at all levels requires high quality design and the protection of amenity. Paragraph 124 of the NPPF sets out that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 6.16 CS Policy EN1 confirms that developments should have consideration for height, scale, massing, local distinctiveness, urban grain, high quality public realm and respond positively to townscape. The detailed design has been developed considerably throughout the pre-application process with SBC.
- 6.17 This scheme has been designed to make optimum use of this central town centre site without giving rise to harm. This is through the provision of one 13-storey building and one 15-storey building connected by a ground floor level which includes car and cycle parking as well as residential entrances. A landscaped podium would be provided on the first floor for use by residents, with extensive public realm enhancement at ground floor level.
- 6.18 The Local Plan Preferred Options document identifies the town centre for high density, high rise development, which the proposed development would deliver. The massing of the scheme is considered to be acceptable and appropriate for the emerging Staines town centre and would prevent overlooking. For example, Charter Square has been approved with 14 storeys and the application for Thameside House includes proposals for 15 storeys.
- 6.19 The height and legibility of the buildings provides a way-finding function for the town centre and is considered appropriate, given the site's central location. The landscaped public realm surrounding these two buildings would also soften their impact on the surrounding area and ensure that the character of the area is enhanced in accordance with Core Strategy Policy EN1.
- 6.20 The layout of the scheme has been designed with two blocks which are proposed at opposite sides of the site to maximise central amenity space, and ensure good residential amenity and outlook while being attractive all around and offering the opportunity for new, high quality development to be brought forward on adjacent land.
- 6.21 The location of the Staines Conservation Area approximately 150m from the site has been considered in the proposals by way of the proposed height and townscape visual impact. As the site is separated from the conservation area by built development and cannot be seen from ground floor level it is considered that it would have no additional impacts beyond this.
- 6.22 The THVA submitted alongside the application states that the scheme complies with the planning policy context and is acceptable in townscape, heritage and visual terms.
- 6.23 The Design and Access Statement provides further detail demonstrating the high quality design of the proposals.

## Housing

### Quantum, Mix and Tenure

- 6.24 The scheme will provide 206 units which seeks to optimise the use of this previously developed site. Staines Town Centre is highlighted as an area for growth in Spelthorne Local Plan Policies. The site is in a sustainable location with high levels accessibility. The proposal is therefore in line with the Government objectives and the NPPF which seeks to optimise the use of brownfield sites for development.
- 6.25 CS Policy HO4 seeks to deliver at least 80% 1- and 2-bedroom units in schemes of four or more dwellings and emerging Policy H1 seeks to deliver a wide choice of homes appropriate to the size, characteristics and location of the site. The proposal includes a mix of 1- and 2-bedroom flats. This mix is considered suitable, given the site's town centre accessible location. The mix has been agreed with the planning and Housing Officer, subject to increasing the provision of 2b4p units which has been incorporated into the development. The housing mix is therefore in accordance with the development plan policies.
- 6.26 The proposed development comprises the following tenure split by number of dwellings as agreed with the Council's Housing Officer:

Table 6.1 Proposed Tenure Split

Unit size	Private		Shared Ownership		Affordable Rent	
	No.	%	No.	%	No.	%
1-bed	57	54%	17	16%	31	30%
2-bed	55	55%	18	18%	28	27%
<b>Total</b>	<b>112</b>	<b>54%</b>	<b>33</b>	<b>16%</b>	<b>61</b>	<b>30%</b>

- 6.27 This results in an overall provision of 46% affordable dwellings. This is marginally less than the policy requirement of 50% in the adopted Plan but it is more than the 40% suggested in the emerging Plan. Nevertheless, the submitted Financial Viability Assessment demonstrates this is the maximum amount that can be achieved. This level of affordable housing will make a significant contribution to Spelthorne's affordable housing needs. As such this provision accords with CS Policy HO3 to ensure the maximum amount of affordable housing is provided having regard to site circumstances and viability.
- 6.28 Of the 94 affordable units, 65% would be affordable rent and 35% would be shared ownership. This is in line with CS Policy HO3 which seeks proposals not to provide more than 35% of affordable housing in intermediate tenure. This tenure split was agreed with the Housing Officer.
- 6.29 Overall, it is considered that the proposed mix, which will seek to deliver a high proportion of 1- and 2-bed units, is in line with adopted policy and would be appropriate for this central and accessible location. The provision of affordable housing is also considered to be in line with the development plan policies.

### Accessibility and Inclusive Design

- 6.30 There is no requirement for accessible homes within adopted policy. However, draft Policy HN1 sets out that all new build dwellings should be constructed in accordance with the requirements of Building Regulations Part M4 (2) and any subsequent updates, unless it can be demonstrated that it is unfeasible to do so.

- 6.31 It is also noted in the emerging Plan that for major residential schemes, unless it can be demonstrated that it is unfeasible to do so, at least 10% of dwellings will be constructed in accordance with the requirements of Building Regulations Part M4 (3) and any subsequent updates. However, discussions with officers confirmed that 10% of dwellings would need to be in accordance with M4(2) requirements.
- 6.32 The proposed development ensures that all units proposed meet the M4(2) standard.
- 6.33 The proposed development will contain eight wheelchair accessible car parking spaces for residents. The blocks are accessible by lifts therefore providing easy access for all residents. Moreover, the proposed communal amenity space and new areas of public realm proposed as part of the development will provide level access to ensure they are accessible to all.
- 6.34 The proposed development is, therefore, acceptable in terms of accessibility and will provide an equitable and inclusive environment for all occupants.

## **Amenity**

### **Residential Amenity**

- 6.35 The adopted policies do not include requirements for space standards of residential dwellings. However, draft Policy H1 of the emerging Plan requires all new residential development across all tenures to meet the Government's nationally described space standards.
- 6.36 The Design and Access Statement accompanying the planning application demonstrates that all the proposed dwellings will meet the minimum space standards and minimum private amenity and storage space set out in both guidance documents.
- 6.37 CS Policy EN1 requires development to achieve a satisfactory relationship to adjoining properties avoiding significant harmful impact in terms of loss of privacy, daylight or sunlight, or overbearing effect due to bulk and proximity or outlook. Draft Policy DS1 requires proposals for new development to demonstrate that they will achieve a satisfactory relationship to adjoining properties avoiding adverse and unneighbourly impacts in terms of loss of privacy, daylight or sunlight.
- 6.38 No dwellings are single aspect and north facing, while 49% of units are dual aspect. The inclusion of public realm enhancement around the perimeter of the site ensures that those dwellings facing onto the ramp to the north of the site will have an acceptable outlook. In addition, plant is located on the first floor of Block B adjoining the service ramp to avoid residential accommodation being located here.
- 6.39 Due to the constrained nature of the site's location within the surrounding context, several design measures have been taken to reduce the effects of overlooking from both neighbouring properties and residential apartments within the development. These include offsetting the position of the two buildings to minimise the possibility for overlooking between residential units within the scheme and with the chamfered faces of the buildings increasing the distance between each building and the surrounding context to create oblique views when viewed from straight on. In the cases where units are adjacent to each other the position of the openings has then been offset to minimise direct overlooking and the windows are to bedrooms and not to living rooms. Further windows to living room spaces have been set back from the building edge to increase overlooking distances and the perforations of the inset balconies have been designed to permit light through while screening off views through for increased privacy. Full height windows to bedrooms have been avoided, to provide greater privacy and flexibility for users within bedrooms.

- 6.40 A noise assessment has been submitted with this application which considers the noise implications of the proposed development. Residential units are not proposed at first floor on block B due to proximity of the service ramp. It is proposed that relevant units should include measures such as enhanced ventilation and glazing. This will allow internal noise levels to achieve the guideline values detailed in ProPG, WHO and BS8233. Achieving these criteria will result in a good acoustic environment inside the proposed dwellings.
- 6.41 The Daylight and Sunlight Assessment submitted with this application considers the daylight and sunlight implications of the proposed new development, including the impact to neighbouring properties and the provision of daylight and sunlight amenity within the proposed development in accordance with local policy. The assessment of daylight and sunlight demonstrates that 181 out of 186 windows (97%) would meet the strict application of the BRE Guidelines. In relation to the quality of light within the rooms that make up the proposed development, it can be seen that 203 out of 207 rooms tested (98%) will either meet or exceed the minimum ADF target values for the specific room use. The Proposed Development would perform well with the neighbouring buildings in terms of daylight and sunlight and will fall within the practical application of the BRE Guidelines.

### **Landscaping**

- 6.42 CS Policy EN1 requires developments to incorporate landscaping to enhance the setting of the development, including the retention of any trees of amenity value and other significant landscape features that are of merit and provide for suitable boundary treatment. Draft Policy DS1 requires development to incorporate landscape to enhance the setting of development, avoid the loss of trees and other vegetation worthy of retention and provide suitable boundary treatment to enhance the setting.
- 6.43 The existing site comprises extensive hardstanding and limited shrubs. Where there is scattered shrubs on the site these have grown in the area of the cleared land which is currently boarded off from the public and of limited value.
- 6.44 The proposed development will provide public realm improvements. This will consist of realign of the road arrangement and reducing areas of tarmac to make the junction more efficient, freeing up more space for pedestrians and nature. A small pocket park will be created comprising of lawn, wildflowers and trees, to help visually draw the greenery on the other side of Thames Street into the centre of Staines.
- 6.45 On the western side of the development it is proposed to improve the pedestrian route to draw people through the Western Arrival Space, where there will be planting and proposed mature trees as well as seating and high-quality paving. There will also be three sets of green screens in the proposed development.
- 6.46 At podium level it is proposed to have a garden which will act as communal amenity space for the residents of the tower blocks. There are three main areas, all linked with a long axis path providing long views.
- 6.47 In addition, the proposed amendments to the Thames Street junction to the west of the site provide an opportunity to create a green link from the site towards the Memorial Gardens and River Thames. For more detail please refer to the Landscape section in Design and Access Statement. As such it is considered that the proposals accord with Policy EN1.

### **External Amenity Space and Play Space**

- 6.48 All proposed dwellings will benefit from private balcony and terrace (for first floor flats) provision with generous depths. The total private amenity space provided would be 1,257 sqm.

- 6.49 Communal amenity space is proposed at podium level. This would incorporate a podium garden which would provide resident's amenity with soft landscape buffers around the edge. The podium garden provides for 965sqm of amenity area, including 271sqm of playable landscape.
- 6.50 CS Policy CO3 requires new housing developments of 30 or more family dwellings to include a minimum of 0.1ha of open space to provide for a children's play area. However, the scheme is providing only 1 and 2 bed units and these are not classified as family dwellings. As such, there is no requirement for play space provision.
- 6.51 Nevertheless, some playable space is provided as some children are likely to live in the development. The proposed playable space will be incorporated throughout the podium garden and public realm and will be suitable for all age groups and encourage a sense of community and enjoyment throughout the scheme. In addition, a dedicated area specifically designed for under 5s is incorporated in the podium garden.
- 6.52 Further detail on this is included in the Design and Access Statement. Overall, the proposed scheme accords with the development plan and guidance in terms of private and communal amenity space and play space provision.

### **Amenity Summary**

- 6.53 Overall, the proposed development will provide high quality units which will accord with space standards and perform well in terms of daylight, sunlight, privacy, noise and overshadowing for both the proposed development and surrounding buildings, in accordance with policy. All dwellings will benefit from private amenity space.
- 6.54 In addition, a comprehensive landscaping scheme including public realm and private amenity space has been developed which would significantly enhance the site and surrounding area compared to that which currently exists and would also provide a pleasant and attractive place to live and pass through.

### **Density**

- 6.55 CS Policy HO5 states that within Staines Town Centre development should generally be at or above 75 dwellings per hectare. Meanwhile, draft Policy SP1 states that new development in Staines is likely to be high density within the town centre to maximise efficient use of land but it will be expected to achieve high quality design in accordance with the Masterplan.
- Within the draft site allocation (ST4/009) it is noted that given the existing character of the area the site could accommodate high density, high rise development, in line with the preferred spatial strategy. The density of the development is 389 dwellings per hectare.
- 6.56 This is a high quality, contextually appropriate development that will provide a good residential environment, high quality amenity space and an appropriate mix of accommodation.
- 6.57 As demonstrated earlier in this Statement and within the submitted Design and Access Statement, it is considered that the design of the proposed development is high quality and the therefore the density is appropriate and accords with development plan policies.

### **Ecology**

- 6.58 Paragraph 170 of the NPPF states that planning policies and decisions should contribute to and enhance the natural and local environment through protecting and enhancing valued landscapes and sites of biodiversity.



- 6.59 CS Policy EN8 sets out that new development should ensure that, where possible, it contributes to an improvement in landscape and biodiversity and avoids harm to features of significance in the landscape or of nature conservation interest. Draft Policy DS2 requires developments to protect existing biodiversity and include opportunities to achieve net gains in biodiversity as well as greening of the urban environment
- 6.60 An Ecological Appraisal has been submitted with the application which includes a Phase 1 Habitat survey, bat roost inspection survey and subsequent emergence surveys. The ecology report concludes that there were no bats were recorded roosting within the building during the surveys. As such there is no requirement for development works to be completed. However, it is advised that given the potential of the building (albeit limited) to support roosting bats , demolition should be proceeded by a toolbox talk and pre-commencement inspection by a bat licenced ecologist.
- 6.61 While there would be no impact on existing ecology, ecological enhancements are to be incorporated into the development proposals including the installation of bird and bat boxes and provision of new native planting within the site to enhance the development for biodiversity. The proposal also includes a biodiversity roof (843sqm). As such, the proposed development would deliver a net gain to biodiversity.
- 6.62 Based on the Ecology Assessment it is considered that the development will not impact on any protected species and will deliver ecological enhancements which represent an improvement from the current position. This is in accordance with adopted and emerging planning policy.

## **Transport and Parking**

### **Transport and Car Parking**

- 6.63 CS Policy CC2 sets out that the Council will seek more sustainable travel patterns including supporting measures to improve non-car based travel. Following this, CS Policy CC3 states that regard will be had to anticipated parking demand, the scope to encourage alternative means of travel (particularly in areas served well by public transport) and the impact on highway safety from potential on-street parking.
- 6.64 The SBC Parking Requirements SPD (2011) sets out the parking requirements for residential developments. Based on the number of units and mix, the scheme would be required to provide 260 parking spaces and 206 cycle parking spaces. In addition, Surrey CC standards require the provision of at least 20% of spaces to be fitted with a fast charge socket for electric vehicles.
- 6.65 The site is located in the Staines Town Centre and has high levels of accessibility being located close to buses and the station and with many facilities within walking distance. Further, in developing the proposals, car ownership in the area and parking restrictions, as well as the provision of Car Club cars has been considered. Having regard to this, the scheme proposes 48 car parking spaces which includes eight wheelchair accessible spaces. This level of provision was agreed through extensive discussions with Surrey County Council Highways team, who confirmed that this level of car parking was acceptable, considering the site's sustainable location. Further, visitors to the site can use the nearby town centre car parks if they travel to the site by car. Two Car Club spaces are also proposed in the layby adjoining the site. Enterprise has confirmed they could provide cars in this location.
- 6.66 It is also proposed that 100% of car parking spaces will have electric vehicle charging points (of which 40% will be active and 60% will be passive). This and other initiatives as set out above will significantly assist in encouraging sustainable transport uses.

- 6.67 It is proposed to include an offer to fund a consultation into a residents parking zone for the Richmond Road and Gresham Road area as this is an area close by which contains uncontrolled parking. This is in response to comments received from Councillors and would ensure that residents of the proposed development do not put pressure on the surrounding on street parking.

### **Cycle Parking**

- 6.68 CS Policy CC3 requires the provision of suitable cycle parking on site to promote cycle use. In total the development will provide space for 220 cycle parking spaces which includes 12 short stay visitor cycle spaces within the public realm. The other 208 spaces will be located in secure facilities at ground floor level. The scheme will therefore provide a high level of cycle parking and will also significantly enhance pedestrian environment. This approach accords with the SBC cycle parking requirements. The proposal also accords with CS Policy CC3 and draft Policy ID2 where SBC note that it is required to include provision of secure, accessible and convenient on-site cycle parking on site.

### **Refuse and Servicing**

- 6.69 As part of the alterations to Elmsleigh Road, two servicing bays will be provided to enable refuse collection and servicing from both of the building cores. The loading bays will be designed as reinforced footway to dissuade unauthorised use.
- 6.70 Dedicated loading zones for refuse lorries will be located on the ground floor to allow easy access. In terms of refuse provision, there will be 2x240 litre bins per flat. For food waste there will be 280 Litre food bins per 10 flats.

### **Transport Summary**

- 6.71 The submitted Transport Statement confirms that the development would not result in an unacceptable impact on highway safety and would not have a severe residual cumulative impact on the road network in accordance with CS Policy CC2. A Travel Plan has also been submitted to promote and achieve sustainable travel choices in accordance with CS Policy CC2.
- 6.72 The development is therefore acceptable with regard to transport, accessible transport, cycle parking, servicing and refuse collection in the context of the local policy. Transport matters are discussed in greater detail in the submitted Transport Assessment.

### **Flooding**

- 6.73 Adopted Policy LO1 ensures that developments seek to reduce flood risk and its adverse effects on people and property in Spelthorne. The policy states that the Council will not permitting residential development or change of use or other 'more vulnerable' uses within Zone 3a or 'highly vulnerable uses' within Zone 2 where flood risks cannot be overcome.
- 6.74 Planning policy on flooding has changed since the Local Plan was adopted. As such, the development proposals have been assessed having regard to the most recent flood data and more recent policy set out in the NPPF and NPPG. Current policy on flooding is also reflected in the policy of the emerging Local Plan which states that development in Flood Zones 2 and 3a will be permitted provided that the vulnerability of the proposed use is appropriate for the level of flood risk on the site and the proposal passes the sequential and exception test as outlined in the NPPF and Government guidance.
- 6.75 Paragraph 160 of the NPPF states for the exception test to be passed it should be demonstrated that: a) the development would provide wider sustainability benefits to the community that

outweigh the flood risk; and b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

- 6.76 The site is located in both flood zone 2 and 3 and is therefore considered both medium and high risk of flooding from fluvial sources respectively. A specialist flood risk assessment and flood plan has been produced as part of the application which demonstrates FRA demonstrates that the site can be brought forward in accordance with the requirements of the NPPF in terms of flood risk and mitigation and passes the Exception Test.
- 6.77 In terms of flood risk management, the minimum level for habitable floors within the new development should be set at 300mm above the 1 in 100 year plus 35% fluvial flood level which is 16.053mAOD.
- 6.78 The design has the lowest residential accommodation at 19.50 AOD (well in excess of the proposed minimum). An emergency evacuation plan will be produced for future residents, this will advise evacuation before flooding takes place. As requested by officers during pre-application discussions, a dry means of escape is also included from the northern residential entrance of the site, under the service ramp towards the High Street to ensure future residents can safely leave the building in the event of a flood.
- 6.79 Mitigation measures will be put in place to prevent cars in the under-croft parking floating away during flooding. The proposed scheme will not decrease the flood volume compensation previously provided onsite.
- 6.80 A surface water drainage strategy has been developed and hydraulically modelled incorporating sustainable urban drainage systems (SuDS) in line with the NPPF and EA standing advice. The strategy is based on a reduction in the surface water runoff rates thus ensuring that the development does not increase the risk of flooding from the site during peak storm events.
- 6.81 In conclusions the FRA demonstrates that the site be brought forward in accordance with the requirements of the NPPF in terms of flood risk and mitigation and passes the Exception Test.

## **Energy, Sustainability and Overheating**

- 6.82 The proposed development is inherently sustainable, embodying the principles of environmental, social and economic sustainability which are central to the NPPF. It makes optimal use of an accessible brownfield urban site and has been designed in accordance with local and strategic sustainability objectives.
- 6.83 The development has been designed in accordance with local and strategic sustainability objectives and will incorporate renewable energy efficient design measures.
- 6.84 An Energy Statement has been submitted with the application for the proposed development and it sets out that the proposed site will be built to comply with Part L 2013 (with 2016 amendments) of the Building Regulations and in line with Spelthorne's Policy CC1 target to achieve a minimum 10% CO<sub>2</sub> reduction over the baseline using the current SAP12 carbon factors.
- 6.85 The proposed development would reduce regulated CO<sub>2</sub> emissions by integrating a range of passive design and energy efficiency measures throughout the building. These measures include improving building fabric standards beyond the requirements of Part L of the Building Regulations.

- 6.86 The proposal would adopt strategies that reduces the buildings energy and water consumption and enhances the site's biodiversity this includes, air source heat pumps, rain water attenuation, climber walls at ground, green roofs and garden spaces at ground.
- 6.87 In addition, for renewable energy, it is proposed to install communal Air Source Heat Pumps (ASHP) on the roofs of each block to supply hot water and space heating to all residential spaces. As a consequence, the proposed development would achieve in excess of 39% savings in total energy demand using fabric and low carbon technology.
- 6.88 The development is therefore in accordance with the requirements of the development plan in this regard. Further details are provided in the submitted Energy Assessment.

## **Archaeology**

- 6.89 The site lies within an Area of High Archaeological Potential (AHAP). Saved Policy BE25 therefore requires an initial assessment of the site's archaeological potential to be prepared.
- 6.90 An Archaeological Impact Assessment (AIA) has been submitted alongside this application. The report investigates past impacts on the site and location of archaeological and geological deposits and assesses whether any further archaeological mitigation is merited, if at all, on the site.
- 6.91 Based on the findings in the AIA it is considered that there are no archaeological assets present on the site predating Post-Medieval times. On this basis no further archaeological mitigation is deemed necessary on this site. This AIA has been reviewed by SCC's Archaeological Officer who has confirmed that as a result of the findings, no further archaeological work would be required in relation to the proposed development.

## **Air Quality**

- 6.92 Spelthorne Borough Council declared a borough-wide Air Quality Management Area (AQMA) in 2003, due to exceedances of the air quality objective for nitrogen dioxide (NO<sub>2</sub>). Consequently, the Site falls within the designated AQMA.
- 6.93 An Air Quality Assessment has been submitted with this application which presents the findings of a detailed air quality assessment of the potential impacts of the proposed development on local air quality during the construction and operational phases. Based on the findings it is considered that air quality does not pose a constraint to the Proposed Development, either during construction or once operational.

## **Summary**

- 6.94 This vacant site, which contained the previous Telephone Exchange and the existing Masonic Hall, provides the opportunity to deliver a significant number of new homes within and accessible and sustainable location within Staines Town Centre.
- 6.95 Overall, the proposed development would comprise the first stage of regeneration of Staines town centre and will help deliver much needed housing in a sustainable location within Staines town centre, as sought by SBC as part of their emerging spatial strategy in their new Local Plan.
- 6.96 The proposed development has been designed so that it would not prejudice any development in the Staines Masterplan from coming forward in the future. It is also considered that the other issues raised at the pre-application meetings have been addressed.

- 6.97 The proposed development could act as a catalyst for the wider regeneration aspirations for Staines Town Centre, while also providing much needed homes in accordance with SBC's emerging spatial strategy.
- 6.98 In summary, the proposed development would deliver a number of benefits, including:
- The delivery of 206 homes to meet the Borough's unmet housing needs;
  - The provision of 46% affordable housing, including 65% in affordable rented tenure which will make a significant contribution to affordability in Staines;
  - Substantial landscaping and public realm improvements on the site and in the surroundings area, creating a green link between the site and the River Thames and enhancing routes between the High Street, parks and river;
  - High quality design which will set a precedence for the regeneration of Staines town centre, without prejudicing any future development to come forward in the Staines Town Centre Masterplan area;
  - Good levels of residential amenity, including the provision of well-sized units, private and communal amenity space;
  - Good performance against daylight and sunlight requirements and negligible impacts on neighbouring amenity in terms of overlooking and overshadowing;
  - A number of sustainable initiatives, including the provision of air source heat pumps for renewable energy provision, Car Club spaces, 100% electric vehicle charging and high levels of cycle parking spaces; and
  - Biodiversity enhancements including the provision of extensive planting and a biodiverse roof.
- 6.99 As such it is considered that planning permission for the scheme should be granted.

## 7.0 Conclusion

- 7.1 This Planning Statement provides a detailed assessment of the application proposed at the application site in relation to national and local planning policy and guidance. This Statement concludes that the proposed development is high-quality, makes efficient use of brownfield land and is acceptable at this location.
- 7.2 The Planning Application proposes to deliver a high-quality development that will result in significant regeneration of the Site. As a direct result of the development proposals, the application will deliver a number of planning benefits for SBC and the local community. These are material benefits which weigh in favour of a grant of planning permission and are set out below:
- 1 The principle of a residential development proposed at the site is firmly supported by the NPPF and emerging policy. The development site is located within the Elmsleigh Shopping Centre Allocation in both the existing and emerging SBC Allocations Document which confirms that residential development was acceptable for this site. The provision of retail floorspace is considered no longer necessary in light of reduced demand in Staines Town Centre, while demand for housing is significant.
  - 2 The development would represent the first phase as a catalyst to achieve wider masterplan aspirations in Staines and would not prejudice the redevelopment of the wider area. The proposed development will provide a sustainable option to contribute to the borough's housing needs.
  - 3 Public realm enhancements around the perimeter of the site and communal open space for residents on a first floor podium will enhance the local area and improve biodiversity, resulting in a net gain.
  - 4 The proposed development will deliver 206 high quality homes. This accommodation will make an important contribution towards local and strategic housing objectives, particularly in light of the lack of a five-year housing land supply.
  - 5 The proposed development will provide a significant number of one and two bed flats which are suitable in this accessible town centre location. The proposed dwelling mix responds to local need and will contribute towards the creation of a mixed and balanced community in Staines.
  - 6 46% of the new homes proposed will be in affordable tenures, including 65% affordable rent. This will assist in addressing the Borough's significant affordable housing needs.
  - 7 All of the proposed units have been designed to comply with National Space Standards. All will experience good standards of amenity and will provide a good residential environment. The development would enhance the character of the local area through the provision of increased landscaping both through public realm enhancements around the perimeter of the site and communal open space for residents on a first floor podium.
  - 8 The development provides 48 car parking spaces due to the close proximity to public transport and town centre location, as well as 2 car club bays. The development will maximise cycle parking (220 spaces) and enhance the pedestrian environment; promoting sustainable travel behaviour amongst residents and visitors.
  - 9 The development will provide a range of economic benefits to the Borough through CIL. It is also estimated that the total local spend by new residents will be c. £1.80m per year, and the Council tax will be c.£451,000 per year.

- 10 The proposed scheme is inherently sustainable, making optimal use of an accessible brownfield urban site within Staines Town Centre. Energy efficient design measures, such as green roof and air source heat pumps will be used.
- 11 The proposals offer no net harm to heritage assets, embrace design and placemaking principles and will knit together the surrounding existing urban fabric. The height of the blocks will act as wayfinding point for the Town Centre.
- 12 The development will include sufficient measures for flooding mitigation.
- 13 The development is capable of achieving a biodiversity net gain.

7.3 The development will, therefore, deliver a range of significant planning and regeneration benefits in terms of maximising the delivery of high-quality homes; dwelling mix and sustainable community objectives; its design quality and townscape response; local environmental enhancement. These substantive, wide-ranging benefits militate strongly in support of the grant of planning permission.

7.4 It is concluded that the proposed development embodies the principles of sustainable development promoted through the NPPF and complies with the objectives and requirements of the development plan. We respectfully submit that planning permission should be granted for the development.





# Appendix 1 Affordable Housing Statement

## Introduction

- 1.1 This Affordable Housing Statement has been prepared by Lichfields on behalf of the applicant, Inland Ltd, to accompany a full planning application for the redevelopment of the Former Masonic Hall and Old Telephone Exchange, Staines-upon-Thames.
- 1.2 The proposed development comprises the following:
- Demolition of the Former Masonic Hall and redevelopment of site to provide 206 dwellings together with car and cycle parking, hard and soft landscaping and other associated works.*
- 1.3 The site is 0.53ha and currently comprises the now vacant Staines Masonic Hall, associated car parking spaces and cleared land which previously included the Former Telephone Exchange which was demolished in 2016. The use of the Masonic Lodge relocated to Twickenham in March 2020, with Inland Homes taking ownership of the site in July 2020.
- 1.4 The development of the application site will provide 206 residential dwellings across two buildings of 13- and 15-storeys. This includes the provision of 105 1-bedroom units and 101 2-bed units alongside 48 car parking spaces. No residential floorspace would be provided on the ground floor.

## Planning Policy Context

- 1.5 This section of the Statement sets out the relevant planning policy context in relation to the provision of affordable housing within the Spelthorne Borough Council (SBC)

## National Policy

- 1.6 At the heart of the National Planning Policy Framework (2019) is a presumption in favour of sustainable development. Local planning authorities should positively seek opportunities to meet the development needs of their area. The NPPF recognises the Government's objective of significantly boosting the supply of homes (paragraph 59).
- 1.7 Paragraph 64 states that "where major housing development is proposed, planning policies and decisions should expect at least 10% of homes to be available for affordable home ownership". The NPPF recognises the role that small sites can have in meeting housing requirements. Great emphasis is placed on making effective use of land in meeting the needs for homes and other uses (paragraph 117). Paragraph 122 states that planning policies and decisions should support development that makes efficient use of land, taking into account the identified need for housing, local market conditions and viability, the availability and capacity for infrastructure and services (existing and proposed), the desirability of maintaining an area's prevailing character and the importance of securing well-designed attractive places.
- 1.8 The NPPF does not set a specific target for affordable housing but states at paragraph 62 that where local planning authorities have identified that affordable housing is needed, they should "expect it to be met on-site, unless off-site provision or an appropriate financial contribution in lieu can be robustly justified and the agreed approach contributes to the objective of creating mixed and balanced communities."
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## **Local Policy**

### **Spelthorne Core Strategy and Policies Development Plan Document (2009)**

- 1.9 The Core Strategy Policies Development Plan Document is part of the Local Development Framework (LDF) and sets out the Council's core strategy and detailed policies. The CS states that by 2026 Spelthorne will have become a more sustainable place to live and work, the economic and social needs of all residents will be met and the environment will have been successfully protected and where possible enhanced.
- 1.10 Strategic Policy 2 (Housing Provision) seeks to ensure that provision is made for sufficient numbers of dwellings to meet the draft Regional Spatial Strategy for the South East requirement for Spelthorne. Within the overall total the Council will require a mix of tenure, size and type to meet identified housing needs, including provision to meet the needs of vulnerable groups. It will seek to ensure that 40% of the total housing provision is in the form of affordable housing.
- 1.11 Policy HO3 (Affordable Housing) sets out the approach that will be used to ensure affordable housing is provided in accordance with Strategic Policy SP2. Having regard to the circumstances of each site, the Council will seek a proportion of up to 50% of housing on sites to be affordable where the development comprises 15 or more dwellings (gross) or the site is 0.5 hectares or larger irrespective of the number of dwellings.
- 1.12 The Council will seek to maximise the contribution to affordable housing provision from each site having regard to the individual circumstances and viability, including the availability of any housing grant or other subsidy, of development on the site.
- 1.13 Policy HO3 also notes that provision within any one scheme may include social rented and intermediate units, subject to the proportion of intermediate units not exceeding 35% of the total affordable housing component.

### **Draft Local Plan (2019)**

- 1.14 SBC is currently preparing a new Local Plan, with a Regulation 18 consultation having taken place between November 2019 and 21 January 2020. Once finalised and adopted, it will replace the current Local Plan.
- 1.15 Draft Policy H1 Homes for all requires new residential development to deliver a wide choice of homes to meet a range of accommodation needs. New development should provide a mix of housing tenures, types and sizes appropriate to the size, characteristics and location.
- 1.16 Draft Policy H2 Affordable Housing requires at least 40% affordable housing units on all schemes of 10 units or more. The tenure and number of bedrooms of the affordable homes provided on each qualifying site must contribute towards meeting the mix of affordable housing needs identified in the Strategic Housing Market Assessment or subsequent affordable housing needs evidence. This currently includes a tenure split of 75% affordable/social rent, with the remainder being other forms of affordable housing. A minimum of 10% of the homes provided on each site must be available for affordable home ownership, except where an exemption applies in the NPPF.

## **Proposed Development**

- 1.17 The proposed development comprises the demolition and redevelopment of the Former Masonic Hall and Old Telephone Exchange site with residential units (C3), as well as new areas of public realm, landscaped amenity space and accessible car parking and cycle parking. The
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proposal consists of two dynamic buildings that are joined at ground floor by a generously landscaped podium.

- 1.18 The proposals involve the provision of 206 new residential dwellings (C3 residential use) in the form of 105 one bedrooms flats and 101 two bedroom flats across two buildings of 13 and 15 storeys.
- 1.19 The proposed development would deliver 46% affordable housing. All units will meet the M4 (2) standard. It is proposed that the tenure will be split with affordable units in one block and private for sale in one block.

## Assessment of Affordable Housing

- 1.20 A mix of different tenures is proposed, including market units, shared ownership and affordable rent. The following tenure breakdown is proposed:

Table 7.1 Proposed Tenure

Unit	Private		Shared Ownership		Affordable Rent	
	No.	%	No.	%	No.	%
1-bed	57	51%	17	49%	31	53%
2-bed	55	49%	18	51%	28	47%
<b>Total</b>	<b>112</b>	<b>54%</b>	<b>33</b>	<b>16%</b>	<b>61</b>	<b>30%</b>

- 1.21 This results in an overall provision of 46% affordable dwellings. This is marginally less than the policy requirement of 50 percent in the adopted Plan but it is more than the 40 percent suggested in the emerging Plan. Nevertheless, the submitted Financial Viability Assessment demonstrates this is the maximum amount that can be achieved. This level of affordable housing will make a significant contribution to Spelthorne's affordable housing needs. As such this provision accords with CS Policy HO3 to ensure the maximum amount of affordable housing is provided having regard to site circumstances and viability
- 1.22 Of the 94 affordable units, 65% would be affordable rent and 35% would be shared ownership. This is in line with CS Policy HO3 which seeks proposals not to provide more than 35% of affordable housing in intermediate tenure. This tenure split was agreed with the Housing Officer.
- 1.23 Overall, it is considered that the proposed mix, which will seek to deliver a high proportion of 1 and 2-bed units, is in line with adopted policy and would be appropriate for this central and accessible location.

## Viability Assessment

- 1.24 A Financial Viability Assessment has been submitted along side this application. The report provides an overview of the scheme and presents evidence for the assumptions adopted within a residual appraisal and then compares the residual land value to an appropriate Benchmark Land Value based upon the value of the existing site (Existing Use Value).
- 1.25 The report demonstrates that the development is unable to support the applicant's proposed affordable housing provision whilst remaining viable, due to generating a viability deficit when measured against market normal profit aspirations.
- 1.26 The overall quantum of affordable units would need to reduce to 72 units (45 for affordable rent and 27 for shared ownership), or 35% of the total, in order to erode the viability deficit. Alternatively, to main the proposal for 46% quantum of affordable housing (94 units), the
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tenure split would need to shift to 41% affordable rent (39 units) and 59% shared ownership (55 units) in order to erode the viability deficit.

- 1.27 Despite the viability conclusion, Inland Ltd are mindful that the scheme design lends itself to one wholly private building and one wholly affordable building. It is also appreciated that there is a strong local need and desire for affordable housing. It is therefore proposed to deliver the scheme including 46% affordable housing with a tenure split of 65% affordable rent and 35% shared ownership.

### **Summary**

- 1.28 Overall, the proposal includes the provision 46% affordable housing. 65% of the affordable housing will be affordable rent and 35% of the affordable housing will be shared ownership.
- 1.29 The Viability assessment has demonstrated that the development is unable to support the applicant's proposed affordable housing provision whilst remaining viable, since it generates a viability deficit when measured against market normal profit aspirations.
- 1.30 Despite this conclusion, Inland Ltd are proposing to provide 46% affordable housing.
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## **Appendix 2 Draft Heads of Terms**

It is considered that the application is likely to be subject to financial contributions for the following:

- Affordable Housing (the proposal includes 46% affordable housing with a tenure split of 65:35 affordable rent to intermediate)
- Public Open Space;
- Sustainable transport measures;
- Securing on and off-site highway improvements.





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