



## **Planning Statement**

**Demolition of the former Debenhams Store and redevelopment of site to provide 226 dwellings (Use Class C3) and commercial units (Use Class E) together with car and cycle parking, hard and soft landscaping, amenity space and other associated infrastructure and works.**

**Former Debenhams, High Street/Thames Street, Staines**

**Future High Street Living (Staines) Ltd**

October 2021

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# 1. Introduction

- 1.1 Cerda Planning Limited has been instructed by Future High Street Living (Staines) Ltd to act on their behalf in respect of submitting a full planning application for the Demolition of the former Debenhams Store and redevelopment of site to provide 226 dwellings (Use Class C3) and commercial units (Use Class E) together with car and cycle parking, hard and soft landscaping, amenity space and other associated infrastructure and works.
- 1.2 The Site is located within the administrative boundary of Spelthorne Borough Council (SBC).
- 1.3 This application is submitted following a pre-application enquiry with the Local Planning Authority (LPA) as well as public consultation with local residents and ward members.
- 1.4 This statement provides a description of the site and the development proposals. The relevant policies of the Development Plan are set out, relevant policies within the emerging Development Plan documents will also be noted, as well as consideration being given to other material planning considerations including the emerging Staines Development Framework and the National Planning Policy Framework (2021). This Statement continues to analyse the main planning issues and assesses how the proposals accord with the policies of the Development Plan and other material planning considerations.
- 1.5 Having assessed the proposal against current local and national policies, and material planning considerations, conclusions are drawn. SPC is unable to demonstrate a five-year supply of deliverable housing sites and as such the adopted development plan is out of date. According to the 2020 Housing Delivery Test, housing delivery in Spelthorne over the past 3 years has been less than 75%. A presumption in favour of development as per paragraph 11 of the NPPF (2021) therefore applies and a tilted balance is engaged. Permission should be granted without delay unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole. The conclusions of this statement indicate that harm as a result of the proposed mixed-use development would not significantly or demonstrably outweigh the scheme's benefits. A departure from the adopted development plan is justified and permission should be granted without delay.

Full justification is given for the rationale for the proposals which should be read in conjunction with other documents submitted with the application including the following:

- Site Layout and all other necessary plans prepared by Corstorphine & Wright
- Design and Access Statement prepared by Corstorphine & Wright
- Contaminated Land Report prepared by Apex Consulting Engineers

- Landscape Strategy prepared by Fira Landscape
- Urban Landscape Visual Assessment prepared by Salfords
- Heritage Statement prepared by Salfords
- Transport Assessment prepared by ADC Infrastructure
- Travel Plan prepared by ADC Infrastructure
- Lighting Impact Assessment prepared by Vitec Consult
- Wind & Micro-climate Assessment prepared by FDGLOBAL
- Fire Statement prepared by Ashton Fire
- Renewable Energy Statement prepared by Vitec Consult (includes an Overheating Assessment)
- Air Quality Assessment prepared by Redmore Environmental
- Flood Risk and Drainage Strategy prepared by ADC Infrastructure
- Daylight/ Sunlight/ Shadowing Assessment prepared by Delva Patman Redler
- Noise Assessment prepared by Hann Tucker
- Tele-communications Impact Assessment prepared by Pager Power
- Viability Assessment prepared by Bailey Venning
- Aerodrome Safeguarding Report prepared by Cyrrus
- Ventilation Strategy Report prepared by Vitec Consult
- Utilities Assessment prepared by Vitec Consult
- Archaeological Assessment prepared by Salfords
- Statement of Community Involvement prepared by Cerda Planning.

## 2. The Application Site

- 2.1 The application site is located within the urban are of Staines-Upon-Thames, on the western edge of Greater London. The application site is located along the Staines Town Centre Primary Shopping Frontage, on the corner of Thames Street where it meets High Street. The River Thames is to the South-West of the site. The surrounding area is characterised primarily by Class E retail uses with residential uses from the first floor and above. Staines is located to the west of the administrative boundary of SBC, in close proximity to the M25 and thus well connected to the wider strategic highway network. The River Thames is to the South-West of the site.
- 2.2 The site is 0.28ha in size.
- 2.3 The application site is permitted for retail use but is currently vacant. A former Debenhams store occupies the site. The existing building comprises four storeys (G + three storeys).
- 2.4 The relevant planning application history on this site is as follows:
- STAINES/FUL/P1942/6 - Erection of a four-storey extension to Department Store – Planning permission granted
  - STAINES/FUL/P1942/8 – Complete erection of Department Store – Planning permission granted
- 2.5 Staines town centre is identified in the SPC adopted local plan as being a ‘Secondary Regional Centre’; the most sustainable of all town centres in Spelthorne. Thames Street, the main thoroughfare through Staines runs adjacent to the western boundary of the application site. High Street runs adjacent to the north of the application site, and Elmsleigh Road to the South. Abutting the eastern boundary of the site is Elmsleigh Shopping Centre.
- 2.6 Distances to services and facilities in Staines are set out in the table below:

Facility	Distance (m)
Spelthorne Museum	72
Staines Memorial Gardens	54
Staines Methodist Church	63
Staines Library	85
Elmsleigh Shopping Centre	0
Little Burrows Montessori Nursery	127
Staines Preparatory School and Nursery	2950
Knowle Park Infant School	144
Kingscroft Junior School	160

The Magna Carta School	846
Lidl	54
Tesco Express	124
Sainsburys	474
The Hythe Medical Centre	871
Ashford Hospital	2800
Orchard Day Centre	4200
Thorpe Park	2700
Staines Health Centre	829
Shortwood Common	975
Staines Bus Station	145
Train Station	600

- 2.6 The application site is located west of the Staines Town Centre and East of the Conservation Area. Other nearby designated heritage assets include the Grade II Listed Buildings known as 44, 46 AND 48 High Street (46 metres) and the Grade II\* Listed Building known as The Blue Anchor Public House (67 metres). The site is also located in the 'Area of High Archaeological potential of Staines Historic Centre and Roman Town', as thus is likely to be of local or regional archaeological significance.
- 2.7 The majority of the site is located within Flood Zone 1, with a very small section of the site's south-west corner located in Flood Zone 2. As such, a very small section of the site has a medium risk of flooding. A Flood Risk Assessment has therefore been submitted to accompany the submission.
- 2.8 The application site can be accessed via sustainable modes of transport; Staines train station is located approximately 606 metres south-east of the application site providing links to central London, and a bus stop served by multiple routes is located immediately west of the site along Thames Street. Located in the town centre, the site can be easily accessed on foot. Staines bus station is also located approximately 160 metres to the south-east.
- 2.9 The Design and Access Statement (which should be read in conjunction with this Statement) sets out a full appraisal of the site and the surrounding area. The Design and Access Statement also provides a contextual analysis; as well as opportunities and constraints presented by the site characteristics and the surrounding residential development.

### 3. The Application Proposals

- 3.1 This application seeks full planning permission for the Demolition of the former Debenhams Store and redevelopment of site to provide 226 dwellings (Use Class C3) and commercial units (Use Class E) together with car and cycle parking, hard and soft landscaping, amenity space and other associated infrastructure and works.
- 3.2 The proposed scheme will consist of 226 residential dwellings across the development which consists of 14 storeys plus ground floor rising to a total height of 66.07 metres. The two towers will be connected by a podium provided at level 1 which can be accessed by both buildings. The proposed residential mix is made up of 47% one bed apartments and 53% two bed apartments with no residential dwellings located on the ground floor. Dwellings comprising 203 (90%) market dwellings and 23 (10%) affordable homes.
- 3.3 The two towers have been positioned accordingly to maximise central amenity space and ensure that residential amenity is to a high and suitable degree. There is a precedent for mixed use development in the surrounding area and the setting and height of the proposal has been set according to the local character and context.
- 3.4 Resident vehicular access to the proposed development would be provided through revisions to an existing vehicular access point onto the A308 Thames Street. Service vehicles will access the site via Elmsleigh Road and will egress the site onto Thames Street. Car parking will be located on the basement, ground floor and mezzanine levels. Additionally the site can be accessed on-foot via the surrounding footpaths at ground floor level and by bike encouraging sustainable modes of travel within this town centre location. The ground floor frontages fronting on to High Street and Thames street will be made up of active frontage comprised of retail space and cycle storage.
- 3.5 151 car parking spaces and 226 cycle storage spaces will be provided. The car parking spaces will be divided between the basement, ground floor and mezzanine levels of the proposed development. A total of 30 (20%) electric car charging points will be provided along with up to 10 (7%) of the 151 car parking spaces will be car club spaces. A further 20% of car parking spaces will be provided with an electrical connection to allow for the instillation of additional charging points if required in the future. Cycle storage will be located on the ground floor.
- 3.6 The scheme will provide on-site amenity space and on-site children's play area. The on-site amenity space will be provided through a combination of outdoor (1853m<sup>2</sup>) and indoor amenity (181m<sup>2</sup>), and a total of 133 private balconies or terraces will be included as private amenity space. The amenity space provided will more than exceed the target of 1305m<sup>2</sup>.

- 3.7 Refuse stores will be located on the ground floor with a total of 91 Euro bins being provided. The buildings will be serviced by a refuse lorry that can enter the site via the access point on Elmsleigh Street and egressing via Thames Street.
- 3.8 The drainage strategy will consist of the use of two below ground storage tanks located beneath the site frontage along Thames Street, adjacent to the eastern boundary, and further attenuation will be achieved within the secondary access point off Elmsleigh Road.
- 3.9 With regards to materials, the preferred solution was to adopt a similar colour palette to the existing store building, with the two principal forms reflecting the contrasting brick and stone detailing on the current building.
- 3.10 On this urban site, external space is key to developing a sense of community, wellbeing and health for residents. The creation of a roof garden provides an opportunity for residents to gain direct access to nature.
- 3.11 The garden provides a hierarchy of spaces that have different scales and degrees of enclosure:
- Private terraces
  - Communal spaces for small groups to gather for events
  - Smaller group spaces for socialising
  - Quiet spaces
  - Toddler play space
  - Communal lawn space
- 3.12 These spaces are enclosed by planting which provides an ever changing backdrop to the space. This planting will provide year round colour, form and interest. The planting will attract wildlife by using a large proportion of species from the RHS plants for pollinators list. Small trees and large shrubs have been included to provide shade, and partially filter views to provide a degree of privacy where required.

#### Background to the Proposals

- 3.13 The Debenhams store closed during January 2021 after a high court ruling and has since remained out of use with no intention to reopen. Following the decline of the high street, this site must be redeveloped in order to rejuvenate Staines town centre as to support both the community and the economy.



- 3.14 Pre-application meetings were undertaken with LPA officers which led to a proposal where both the officers and developers were content with the current proposals. For more detail on the design evolution through pre-application, see the design and access statement.

## 4. Planning Policy and Material Considerations

4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.

### 4.2 Development Plan

4.3 The Development Plan comprises the following documents:

- Core Strategy and Policies DPD 2009
- Allocations DPD 2009
- Local Plan 2001 – Saved Policies
- Proposals Map 2009

4.4 The following policies of the adopted Development Plan are relevant to this application:

4.5 Local Plan 2001 – Saved Policies:

- Policy BE25: Archaeology and Ancient Monuments

4.6 Core Strategy and Policies DPD 2009:

- Policy SP1: Location of Development
- Policy LO1: Flooding
- Policy SP2: Housing Provision
- Policy HO1: Providing New Housing Development
- Policy HO3: Affordable Housing
- Policy HO4: Housing Type and Size
- Policy HO5: Density of Housing Development
- Policy EM1: Employment Development
- Policy TC2: Staines Town Centre Shopping Frontage
- Policy SP5: Meeting Community Needs
- Policy CO2: Provision of Infrastructure
- Policy SP6: Maintaining and Improving the Environment
- Policy EN1: Design of New Development
- Policy EN3: Air Quality
- Policy EN5: Buildings of Architectural and Historic Interest
- Policy EN6: Conservation Areas, Historic Landscapes, Parks and Gardens
- Policy EN11: Development and Noise

- Policy EN12: Noise from Heathrow Airport
- Policy EN13: Light Pollution
- Policy EN15: Development on Land Affected by Contamination
- Policy SP7: Climate Change and Transport
- Policy CC1: Renewable Energy, Energy and Conservation and Sustainable Construction
- Policy CC2: Sustainable Travel
- Policy CC3: Parking Provision
- Policy CC4: Non-car Access to Heathrow and Airtrack

4.7 Supplementary Planning Documents/Other Relevant Guidance:

- National Design Guide (2019)
- Flooding SPD (2012)
- Housing Size and Type SPD (2012)
- Design of Residential Extensions and New Residential Development (2011)

## **Material Planning Considerations**

### **National Planning Policy Framework**

4.8 The National Planning Policy Framework, was published in July 2021 and sets out the government's planning policies for England and how it expects them to be applied. It is a material consideration that should be taken into account in the determination of all planning applications. At the heart of the Framework is a presumption in favour of sustainable development.

4.9 Paragraph 8 of the Framework states that there are three overarching objectives to sustainable development that should be pursued in mutually supportive ways. These objectives are:

- an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

- an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
- 4.10. Paragraph 11 sets out that Plans and decisions should apply a presumption in favour of sustainable development. For decision-taking this means:
- c) approving development proposals that accord with an up-to-date development plan without delay; or
  - d) 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 taken as a whole
- 4.11. Paragraph 33 sets out that policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy.
- 4.12. Paragraph 60 states that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.
- 4.13. Paragraph 69 states that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly.
- 4.14. Paragraph 73 sets out that local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.

- 4.15. Paragraph 86 sets out that Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Policies should recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.
- 4.16. Paragraph 92 sets out that Planning policies and decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments.
- 4.17. Paragraph 119 sets out that planning policies and decisions should support development that makes effective use of land, and makes as much use as possible of previously-developed land.
- 4.18. Paragraph 124 states that planning policies and decisions should support development that makes efficient use of land, taking into account:
- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
  - b) local market conditions and viability;
  - c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
  - d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
  - e) the importance of securing well-designed, attractive and healthy places.
- 4.19. Paragraph 125 states that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site.
- 4.20. In such circumstances, local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. When considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards)

4.21. Paragraph 126 states that the creation of high quality, beautiful and sustainable 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. Paragraph 130 states that to ensure this, policies and decision should ensure that developments:

- will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- are sympathetic to local character and history, including the surrounding built environment 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;
- 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 create safe and accessible environments; and
- create places that are safe, inclusive and accessible and which promote health and well-being, 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.

4.22. Paragraph 199 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

### **Emerging Local Plan**


4.23 The following documents do not comprise the current adopted Development Plan, but are emerging and may form part of the Development Plan upon their completion and adoption:

- Emerging Local Plan 2020-2035
- Staines Development Framework SPD

Emerging Local Plan 2020-2035

- 4.24. SBC have commenced work on a new local plan they will set out how the local area will develop over at least the next 15 years. Once adopted, it will replace the 2009 Development Plan.
- 4.25. The new Local Plan is at an early stage and a Regulation 19 draft plan is yet to be produced or consulted upon. Consequently, the emerging local plan is not yet in a position to be considered at the Examination stage by an external Inspector.
- An Issues and Options Consultation (Regulation 18) took place between May-June 2018
  - A Preferred Options Consultation (Regulation 18) took place between November 2019-January 2020
- 4.26. According to SBC's Local Development Scheme, which was updated in May 2021, a draft local plan consultation is planned for early spring 2022, with submission to the Secretary of State in Summer 2022.
- 4.27. The application site was identified as a preferred site allocation (ST4/019) in the Preferred Options Consultation, following on from its identification in the Strategic Land Availability Assessment 2020 (SLAA). In the published Site Allocations Document, it is observed by the LPA that:
- "the site is well-located within Staines Town Centre, with local services and employment within walking distance. Given the existing character of the area the site could accommodate high density, high rise development, in line with the preferred spatial strategy... mitigation would be required to reduce the impacts of the increased cumulative concentration of residential dwellings in the area (in association with ST4/009). The site is subject to several non-absolute constraints but these are considered to be mitigatable... The site could accommodate mixed commercial and residential use. Nearby emerging schemes have set a precedent for this character of development within the town centre given the efficient use of land and sustainable location. The site could potentially achieve approximately 250 units, with retail/commercial use at the ground floor to maintain an active frontage on the High Street".*
- 4.28. A copy of the allocation accompanying plan can be seen below:

Site ID	ST4/019	Site Name	35-45 High Street, Staines (Debenhams Site)
Area (ha)	0.27	Location	Urban
Density	900 dph	Approximate number of dwellings	250 dwellings
Requirements			



- 4.29. Work is also ongoing upon Staines Development Framework, which will set out the vision for Staines upon Thames, opportunities for growth and infrastructure requirements. The Framework shall reflect the objectives and policies of the emerging Local Plan and support its site allocations. However, this document is also in its early stages of development. The first consultation on the Framework, 'Objectives and Options' ended in June 2021. In this, 'The Debenhams Site' was identified as an option from the SLAA for mixed use development. "to encourage resilience of the town centre in the long run and respond to economic need". A Draft Framework Consultation is due to take place November-December 2021, with planned submission to the Secretary of State in June 2022 alongside the emerging Local Plan.
- 4.30. Paragraph 48 of the NPPF (2021) sets out that LPAs may give weight to relevant policies in emerging plans according to: their stage of preparation, extent of unresolved objections and degree of consistency with the Framework.



## 5. Planning Analysis

5.1 This section of the Statements sets out the case for development of the site.

5.2 It is considered that the proposals raise the following considerations:

- Principle of Development;
- Housing Supply;
- Housing Density;
- Design, Layout and Townscape;
- Play Space, Open Space and Residential Amenity;
- Housing Mix and Size
- Affordable Housing and Viability
- Heritage
- Archaeology
- Highways and Access;
- Noise;
- Air Quality;
- Flood Risk and Drainage;
- Energy and Sustainability;
- Daylight/Sunlight/Overshadowing
- Wind and Micro-Climate
- Tele-Communications
- Fire Strategy
- Planning Balance

5.3 These matters are addressed in turn below.

### Principle of Development

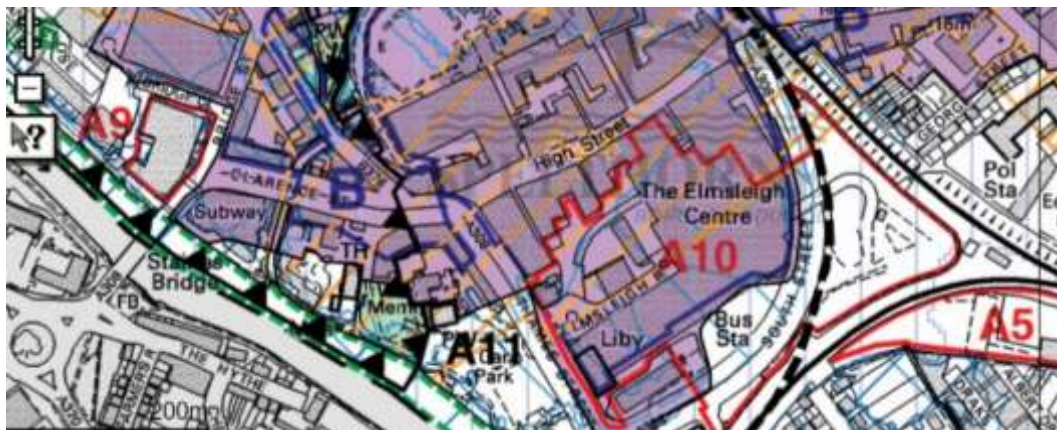
5.4 The current development plan is the Core Strategy and Policies DPD, Allocations DPD and the Adopted Proposals Map 2009. There are also a number of saved policies from the 2001 Spelthorne Local Plan which form part of the current development plan.

5.5 The emerging plan comprises the Local Plan 2020-2035 and the Staines Development Framework SPD.

5.6 Policy SP1 of the Core Strategy states that new development will be located in the existing urban area. Existing retail centres will be protected to meet future retail needs and employment

centres shall be retained in Staines town centre. Policy EM1 states that the council will maintain employment development by retaining the Staines town centre Employment Area.

- 5.7 Policy SP4 states that the Council will ensure that town centres remain the focus for retailing in the borough. It will make provision for further retailing and related services, and support employment development.
- 5.8 Policy TC2 states that uses other than retail will not be supported in the Staines town centre primary shopping frontage where they would lead to a loss of retail floorspace. Exceptions to this include where the proposal would not harm the predominantly retail character of the town centre, either individually or cumulatively with other non-retail developments. A non-retail use may be accepted where it is demonstrated that it would contribute to the long-term vitality and viability of the centre. A viability statement has been submitted in support of the application.
- 5.9 The application site comprises previously developed land in the urban area of Staines, along the Staines Town Centre Primary Shopping Frontage. Staines is identified as the Secondary Regional Centre, the most sustainable town centre in Spelthorne.
- 5.10 Despite the existing building on site being vacant, the site itself is permitted for Class E use, which includes both retail and employment uses. The existing site accommodates a former department store. An extract taken from the Core strategy and Policies DPD Proposals Map below shows in purple that the applications site is located in a designed employment area:



- 5.11 The proposed development would include Class E development at ground floor along the High Street frontage and wrapping around fronting the northern end of Thames Street. The Council's Retail and Town Centre Study Update report was published in March 2018. This report has been written in conjunction with the earlier 2015 Retail Study and is being used as evidence base for the emerging new Local Plan. Whilst, the emerging Local Plan is in its early stages and has limited weight when assessing the proposal, published evidence-bases are still a material planning consideration.

5.12 The 2018 Update report states that there has been little new retail development within Staines town centre since the original 2015 study was carried out. Combined with the effects of COVID-19, there is a lack of need for substantial retail expansion in the town centre.

5.13 Notwithstanding the site's permitted retail use, the Council's Preferred Options Consultation identifies the application site as Site allocation ST4/019 having potential to:

***“accommodate mixed commercial and residential use. Nearby emerging schemes have set a precedent for this character of development within the town centre given the efficient use of land and sustainable location. The site could potentially achieve approximately 250 units, with retail/commercial use at the ground floor to maintain an active frontage on the High Street”.***

5.14 The proposed mixed-use development would not result in the complete loss of retail on -site and would be proportionate to the current retail climate. The proposed mixed-use would not harm the retail character of the town centre and would contribute to its long-term vitality and viability. It is therefore considered that the proposed development would satisfy Policy TC2 of the Core Strategy and Policy EC3 of the Emerging local plan.

5.15 Housing Supply

5.16 In considering the appropriateness of the site for residential development, whilst not an allocated site in the adopted plan, it is located in a highly sustainable location, with national policy supporting mixed-use development including residential development above shops on high streets. It is also important to note that the existing plan is not up-to-date and does not plan for sufficient housing to be delivered to meet the current housing need, as reflected by the current housing land supply and recent housing delivery.

5.17 Paragraph 60 of the NPPF (2021) seeks to support the Government's objective of significantly boosting the supply of homes, by highlighting the importance of allowing a sufficient amount and variety of land to come forward where it is needed.

5.18 Paragraph 74 of the NPPF (2021) requires local planning authorities to “identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old”.

5.19 The Core Strategy and Policies DPD 2009 sets out a housing target of 166 dwellings per annum. This target is more than five years old and as such the up-to-date figure is measured against the area's local housing need calculated using the Government's standard method. Using the 2014 household growth projections and local affordability, there is a need for 611 dwellings per annum in Spelthorne.

- 5.20 Paragraph 74 of the NPPF (2021) goes on to say that the supply of specific deliverable sites should also include a buffer of:
- a. 5% to ensure choice and competition in the market for land; or
  - b. 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or
  - c. 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply
- 5.21 The target set out in the in the Council's adopted Core Strategy and Policies DPD is more than 5 years old and therefore an up-to-date figure is not based on a 'recently' adopted plan, but instead local housing need.
- 5.22 As set out in the Housing Delivery Test most recently published by the Secretary of State in January 2021, Spelthorne has only been able to deliver 50% of its required housing in the last three years. Planning Practice Guidance (Paragraph: 042 Reference ID: 68-042-2019072) explains that delivery below 85% constitutes a significant under delivery of housing and as such a 20% buffer upon a LPA's five-year housing supply as per Paragraph 74(c) of the NPPF (2021) applies. Therefore, with a 20% buffer, SPC has a target of delivering 733 dwellings per annum (dpa) between 1<sup>st</sup> April 2022 to 31<sup>st</sup> March 2027, or 3666 over the five years.
- 5.23 SPC's Strategic Land Availability Assessment identifies potential sites for future housing over the emerging plan period. In this, sites to deliver approximately 3,513 dwellings over the five-year period have been identified. Applying a 20% buffer to this updated figure, the identified sites only represent a 4.79-year supply and subsequently SPC is unable to demonstrate a five-year supply of deliverable housings sites.
- 5.24 In light of the above, SBC has failed to deliver sufficient homes to meet the needs of residents over the past three years and is unable to demonstrate that there is sufficient land to deliver the required housing need over the next five years.
- 5.25 Paragraph 11 (d) of the NPPF states that:
- “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 taken as a whole”

5.26 As per footnote 8, the housing policies of the adopted Core Strategy and Policies DPD are out of date by virtue of delivering less than 75% of SPC’s housing requirement in the last 3 years and being unable to demonstrate a five-year supply of deliverable housing sites based on an up-to-date figure using the Government’s Standard Method for calculating housing need. A presumption in favour of sustainable development therefore applies in the case of the current application, and a tilted balance is engaged in favour of this unless harm from the development would significantly and demonstrably outweigh the benefits.

5.27 Paragraph 119 of the NPPF (2021) sets out that planning policies and decisions should support development that makes effective use of land, and makes as much use as possible of previously-developed land. Paragraph 125 of the NPPF (2021) discourages low density development and states that developments which make optimal use of a site’s potential should be supported where there is a shortage of land for meeting identified housing needs.

5.28 Policy HO1 seeks to ensure that provision for housing is made by encouraging mixed use schemes where housing can be accommodated in an acceptable manner without compromising other planning objectives. Category (g) of this policy states that this can be done by:

*“Ensuring effective use is made of urban land for housing by applying Policy HO5 on density of development and opposing proposals that would impede development of suitable sites for housing.”*

5.29 The site is located within Staines town centre, in the urban area on a previously developed site, within walking distance of Staines train and bus station. As such the site is within an accessible location close to facilities and public transport links. It has been identified that there is a shortage of land identified to meet SPC’s housing needs and delivery of housing over the last 3 years has been substantially below that required to meet these needs. It is the Applicant’s view that the proposed development would significantly help boost the supply and delivery of housing in area where there is an identified shortage of land for meeting these needs.

5.30 In the Preferred Option Consultation, it was identified the application site as Site allocation ST4/019 having potential to achieve approximately 250 units, with retail/commercial use at the ground floor to maintain an active frontage on the High Street. Whilst it does not form part of the adopted Development Plan, it acknowledges the suitability of the site for delivering residential development.

- 5.31 Subject to an appropriate density of residential units, the proposed development would meet the aims of the National Planning Policy Framework (NPPF) and Policy HO1 and HO5 of the Core Strategy and Policies DPD.

#### Housing Density

- 5.32 Making efficient use of potential housing land is an important aspect in ensuring housing delivery, particularly where there is a shortage. Policy HO1 of the Core Strategy states that housing provision is required to make effective use of urban land by applying Policy HO5 on density of development. Policy HO5 states that:

*“within Staines town centre development should generally be at **or above** 75 dwellings per hectare”*

- 5.33 Policy HO5 states that where higher density development is proposed, this *“may be acceptable where it is demonstrated that the development complies with Policy EN1 on design, particularly in terms of its compatibility with the character of the area and is in a location that is accessible by non-car-based modes of travel.”*
- 5.34 Furthermore, paragraph 119 of the NPPF (2021) sets out that planning policies and decisions should support development that makes effective use of land, and makes as much use as possible of previously-developed land. Paragraph 125 of the NPPF (2021) discourages low density development and states that developments which make optimal use of a site’s potential should be supported where there is a shortage of land for meeting identified housing needs. As set out in the section above, there is a shortage of land for meeting identified housing needs.
- 5.35 The application proposes 226 residential units on a site of 0.28 hectares, equating to 804 dph. This density is therefore above 75 dwellings per hectare. Permission has been granted by SPC for similar developments in the area whereby policy HO5 has been applied flexibly, notably:

- 17-51 London Road, Staines-upon-Thames: *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 (ref. 19/00290/FUL) - 429dph*
- Renshaw Industrial Estate, 28 Mill Mead, Staines-upon-Thames: *Erection of up to 275 units in 2 buildings, 248 car parking spaces and publicly accessible green space. Outline application determining access, scale and layout only (ref. 17/01365/OUT) - 320dph*
- Former Majestic House, High Street, Staines-upon-Thames: *39,750sqm of floor space to comprise residential (Class C3), office (Class B1a), Class C1, Class D2,*



*Class A1, Class A2, Class A3, Class A4 and Class A5 as well as the provision of a new link road and pedestrian routes, car and cycle parking, highways and transport facilities, public open space, landscaping and other associated works (ref.*

*16/00179/RMA (Phase 1a)) - 318dph*

- Charter Square, High Street, Staines-upon-Thames: *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 (17/01923/FUL (Phase 1b)) - 297dph*
- Bridge Street Car Park, Bridge Street, Staines-upon-Thames: *Planning application for demolition of existing unlisted car park, sea cadet building, access ramp, deck and steps in Staines Conservation Area and redevelopment of the site to provide buildings ranging from 4 to 12 storeys in height comprising 358 sqm (GIA) ground floor commercial floorspace (Use Class A1/A2/A3) and 205 residential units (Use Class C3), together with ancillary residents gym, associated car parking, open space, landscaping and infrastructure works (15/01718/FUL). Listing Building Consent application for minor alterations and works to Grade II Listed Staines Bridge in association with the redevelopment of the adjacent Bridge Street Car Park (15/01718/LBC) – 306dph*

5.36 It is also important to acknowledge the density recommended for the application site in allocation ST4/019 of the Preferred Options Consultation Site Allocations documents for the emerging local plan. According to this allocation:

*“the site is well-located within Staines Town Centre, with local services and employment within walking distance. Given the existing character of the area the site could accommodate high-density, high-rise development, in line with the preferred spatial strategy... the site is subject to several non-absolute constraints but these are considered to be mitigatable... The site could accommodate mixed commercial and residential use. Nearby emerging schemes have set a precedent for this character of development within the town centre given the efficient use of land and sustainable location. The site could potentially achieve approximately 250 units, with retail/commercial use at the ground floor to maintain an active frontage on the High Street”.*

5.37 The draft allocation anticipates a density equating to 900dph.

5.38 The site is within walking distance of Staines train and bus station, and thus highly accessible via non-car-based modes of travel. Combined with the accompanying Design and Access

Statement, the sections to follow demonstrate how the criteria in Policy EN1 are met by the proposed development, thereby demonstrating the density of development is appropriate on the site.

#### Design, Layout and Townscape

5.39 Policy EN1(a) of the CS & P DPD states that the Council will require a high standard of 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.

5.40 The National Design Guide, Planning practice guidance for beautiful, enduring and successful places, produced by the MHCLG in 2021, addresses how we recognise well design places by outlining ten characteristics; context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources and life span.

5.41 Paragraph 70 refers to the use of tall buildings playing a positive urban design role and acting as landmarks:

*‘Well-designed tall buildings play a positive urban design role in the built form. They act as landmarks, emphasising important places and making a positive contribution to views and the skyline.’*

5.42 Paragraph 71 goes onto state that:

*‘Proposals for tall buildings (and other buildings with a significantly larger scale or bulk than their surroundings) require special consideration. This includes their location and siting; relationship to context; impact on local character, views and sight lines; composition - how they meet the ground and the sky; and environmental impacts, such as sunlight, daylight, overshadowing and wind. These need to be resolved satisfactorily in relation to the context and local character.’*

5.43 Staines town centre is characterised by a number of relatively tall buildings. Tall building applications have been approved in recent years including:

- Charter Square (London Square) – 13 storeys – approved on 15th February 2019
- 17 – 51 London Road (Berkeley Homes) – 10 – 14 storeys – approved on 11th July 2019



- Renshaw industrial Estate, 28 Mill Mead (Renshaw UK Ltd) – 11 storeys – approved 27th July 2018
- Bridge Street (Bellway Home) – 12 storeys – approved 15<sup>th</sup> March 2016 (now expired)

5.44 The emerging Local Plan Preferred Options consultation, in relation to the application site, identifies:

*‘As the site is located on the corner of the High Street the opportunity exists for a high quality, landmark building.’ ‘The introduction of high rise residential use could facilitate the improvement of the visual appeal of the site through high quality design. This is particularly significant given the site’s prominent corner location on the High Street.’*

5.45 This town centre location is capable of accommodating high rise development that is designed to a high quality. The two blocs will be connected at level 1 and will provide both car and cycle parking along with pedestrian access points. Amenity space will be provided both internally and externally contributing to public and private realm enhancements. The layout of the two towers ensures that central amenity space is provided to a level that benefits residential outlook whilst maintaining the surrounding built-up frontages.

5.46 The emerging Local Plan Preferred Options Site Allocations document states that the site is capable of accommodating high-rise, high-density development. The height of the proposals being 14 storeys plus ground floor will act as a way-finding building within this town centre location at the key junction of Clarence Road, Thames Street and High Street.

5.47 The design of the proposals evolved during pre-application discussions with the Local Planning Authority. Development proposals focused on locating taller elements to the extreme north and south of the site, with reduced height to the centre which could form the basis of external amenity spaces. The rationale for this was based on locating the main elements of the building on the key axis to Thames Street, and the key junction of Thames Street, Clarence Street and High Street.

5.48 Ensuring a lower height element to the middle of the site would open up light through the site and create a design that responded more equally to all directions, rather than have a clear front and back that is evident with the existing building.

5.49 Initial proposals were based on square stepped tower forms with a 6-storey spine linking the 2 blocks. This concept was developed through a number of pre application discussions but could not be supported as the density of the proposed scheme could not be serviced adequately by the required on-site infrastructure as well as the link having insufficient dual-aspect units and

creating long and dark internal corridors, whilst the form of the building should respond more to the legacy of the existing Debenhams store.

- 5.50 The scheme moved away from a single mass and developed into two towers with a connecting podium at the base. The revised form provided greater opportunity for: increases in dual aspect apartments, no long internal corridors, generous external amenity space at podium level, 360 degree views of, and out from, the buildings.
- 5.51 The design of the podium was developed to respond to the immediate context. At ground level there is Class E space along the High Street and Thames Street, providing shop fronts which create active and lively frontages to fit in with the nearby retail buildings. The landscape design was carefully considered to provide a relaxing and private space for the residents; the external amenity space at level 1 connects the two towers allowing for social interaction between both towers.
- 5.52 The concept was then developed to accommodate the key features of the existing store, the canted corner on the axis of Clarence Street, and develop the forms of the building around this geometry. A unique octagonal plan form emerged that was informed by the canted corner, with a similar form proposed to the south that also took advantage of the fantastic views across to the Thames.
- 5.53 The proposed number of apartments on the site was reduced to enable the density to be supported by the on-site infrastructure requirements with regard to servicing the building, and the language was developed to form a stronger architectural response which reflected some of the materiality and detailing evident elsewhere on the High Street. Specifically, the corbelled brick head details on some of the older stores in the High Street, and the soldier courses and brick detailing common on the existing Debenhams itself.
- 5.54 Refinement of the building form led to the inclusion of a Tripartite façade, incorporating a base containing retail functions, a middle section of uniform design, with a 2-storey crown element and set back to form the top. This is further articulated by the double order height to the gables, and the secondary recessed balconies to the side elevations that splits the form into double octagons.
- 5.55 The building was developed with a clear base, middle and top to provide architectural interest. The base is articulated as a double height retail frontage with framed openings to match the existing detail window surrounds. Columns are expressed in textured brickwork bands that are continued into the residential entrances which are carved out of the octagonal form. The middle is a single order facade of wide brick piers and spandrel panels in brick with recessed corbelled brick window head details to match similar details in the town centre. Simple horizontal transoms to windows reflect the overriding 600mm grid that informs the elevation design. The

top is a double order is expressed at the top of the building to form the crown, with a further recess cut out on the side elevations that mirrors the detail at the entrance at ground level, visually separating each into two separate octagonal forms. A set back floor with a continuous terrace to the edge provides a soft landscaped crown that is topped with a cantilever canopy with fin supports to create further depth and shadow.

- 5.56 With regards to materials, several options were considered during the process of the design development. These included facing brick that was similar to the existing building, but also looked at Pre cast options and GRC as alternative contrasting materials to introduce into the town centre that would act more as a beacon of regeneration.
- 5.57 Having completed several studies and visual assessments, the preferred solution was to adopted a similar colour palette to the existing store building, with the two principal forms reflecting the contrasting brick and stone detailing on the current building.
- 5.58 To assess the effect of the proposed development on the townscape, a Townscape Impact Assessment has been prepared to support the planning application. A summary of the report is as follows.
- 5.59 Numerous keys views have been identified within the area surrounding the site, many of these key views include important characteristics of the surrounding landscape, such as the River Thames, the Staines Conservation Area and the developed areas of the shopping district. The sensitivity to change and magnitude of impact of the key viewpoints is assessed. The proposed development will likely result in minor to moderate adverse effect on some of the key viewpoints within the Staines Conservation Area and will have a negligible effect on several other identified key viewpoints. The key views that have been analysed are as follows:

View	Sensitivity to Change	Anticipated Effects	Magnitude of Impact	Quality of Impact	Significance of Effect
View looking northeast from the Thames Path, south of the river.	Low	The proposed development partially shielded by tree line, although upper levels will be visible above the existing skyline and tree line.	Low	Neutral	Direct, long-term negligible
View looking north from the Memorial Gardens.	Medium	The proposed development will form a prominent feature from within the Memorial Gardens. The proposed development will mostly blend in with the existing built form, however, the upper levels of the proposed development will be substantially higher than the	Medium	Adverse	Direct, long-term moderate adverse

		existing building.			
View looking south from the junction at Thames Street and South Street.	Low	The proposed development will form a prominent feature from within views from Thames Street. The proposed development will mostly blend in with the existing built form, however, the upper levels of the proposed development will be substantially higher than the existing building.	Low	Neutral	Direct, long-term negligible
View looking west from Tilly's Lane.	Medium	The proposed development will form a prominent feature from within views from High Street. The proposed development will mostly blend in with the existing built form, however, the upper levels of the proposed development will be substantially higher than the existing building.	Medium	Adverse	Direct, long-term moderate adverse
View looking east from the south end of Church Street.	Medium	The proposed development will form a prominent feature from within views from Clarence Street. The proposed development will mostly blend in with the existing built form, however, the upper levels of the proposed development will be substantially higher than the existing building.	Medium	Adverse	Direct, long-term moderate adverse
View looking east from Market Square.	Medium	The proposed development partially shielded by the buildings surrounding the Market Square, although upper levels will be visible above the existing skyline.	Medium	Adverse	Direct, long-term moderate adverse
View looking east from the junction between Clarence Street and Staines Bridge.	Medium	The proposed development will form a prominent feature from within views from Clarence Street. The proposed development will mostly blend in with the existing built form, however, the upper levels of the proposed development will be substantially higher than the existing building.	Medium	Adverse	Direct, long-term moderate adverse

View looking east from Staines Bridge.	Medium	The proposed development is partially shielded by the buildings along Clarence Street, although upper levels will be visible above the existing skyline. The midrange view is mostly shielded by Thames Edge Court.	Low	Neutral	Direct, long-term negligible
View looking east from The Hythe.	Low	The proposed development is partially shielded by the buildings along Clarence Street, although upper levels will be visible above the existing skyline. Trees along the Thames tend to shield views of the skyline during the Summer months.	Low	Neutral	Direct, long-term negligible
View looking west from High Street East.	Medium	The proposed development will form a prominent feature from within views from High Street. The proposed development will mostly blend in with the existing built form, however, the upper levels of the proposed development will be substantially higher than the existing building.	Medium	Adverse	Direct, long-term moderate adverse
View looking south from Church Street.	Medium	The proposed development is partially shielded by the buildings along Church Street, although upper levels will be visible above the existing skyline.	Low	Neutral	Direct, long-term negligible
View looking west from Elmsleigh surface car park.	Low	The upper levels of the proposed development will be visible above the existing skyline.	Low	Neutral	Direct, long-term negligible
View looking south from Mustard Mill Road within the Staines Conservation Area.	Low	The proposed development will not be visible in views from Mustard Mill Road.	Negligible	Neutral	Direct, long-term negligible

5.60 Due to the nature of construction, it is inevitable that some adverse effects would occur to the townscape and visual amenity of the proposed development site and its immediate environs. This adverse effect would be caused by the height of the proposed development, which would be greater than that of its surroundings.

- 5.61 Whilst the height of the buildings may cause minor to moderate adverse effects on views within the townscape, the public benefits of the development should be compared to the harm to these views. The proposed development includes the construction of 226 dwellings, which would add to the lack of residential properties within central Staines. Furthermore, the development of 226 dwellings would re-establish part of the historic use of the Site as a residential area.
- 5.62 Other aspects of the development, such as the colour and texture, are more in keeping with the wider townscape, and therefore the proposed development will mostly blend in with the existing built form. Clarence Street and High Street both comprise 18th-, 19th- and 20th-century buildings, which add to the diversity of the street. The proposed development will add to this diversity.
- 5.63 The massing of the building has been taken into consideration and has been broken down to compliment the existing character of the Site. The proposed buildings have been articulated into base middle and top to break down the façade and the crown at the top breaks down the massing. The proposed development also responds to the present geometry through the incorporation of a chamfered corner and the use of the podium connecting the two towers. The base will include shops along High Street, which will fit in with the context of the surrounding streetscape.
- 5.64 In conclusion, through high-quality design, the proposed development will improve the visual appeal of the site and integrate the proposed development within its surroundings.

#### Play space, Open Space and Residential Amenity

- 5.65 Policy CO3 requires the provision of public open space for residential developments. The policy states that where any new housing is proposed in areas of the Borough with inadequate public open space, or where provision would become inadequate because of the development, the Council will require either the provision of new on-site open space or a financial contribution towards the cost of new off-site provision. If on or offsite provision is not feasible, the Council will require a contribution in the form of a commuted sum to improve existing sites to enhance their recreational value and capacity.
- 5.66 The policy goes on to state that in new housing development of 30 or more family dwellings (i.e. 2-bed or greater units) the Council will require a minimum of 0.1ha of open space to provide for a children's play area. Such provision is to be increased proportionally according to the size of the scheme. The development proposes 120no. 2-bed family dwellings and therefore has a requirement for 0.4ha of children's play area.
- 5.67 Whilst there is open space at first floor level, this space is aimed towards providing amenity space for residents as a place to relax and reflect. It is not considered to be a suitable location

to accommodate a large children's play area, with the space most likely utilised by adults, having regard to the family dwellings on-site being 2-beds, and not larger family homes. Additionally, inclusion of a large children's play space would require buffer distances to the residential dwellings which are not achievable on the site without the play area dominating the space. As a result, a small children's play provision area is provided on the lawned area, with a view to providing the balance of provision as a commuted sum for off-site provision, potentially deliverable within the Memorial Gardens..

- 5.68 The Council's SPD on Residential Extension and New Residential Development 2011 provides general guidance on minimum garden sizes (Table 2 and paragraph 3.30). In the case of flats, it requires 35 sq. m for the first 5 units, 10 sq. m for the next 5 each and 5 sq. m for each other flat. Based on 226 flats, the total required amenity space would be 1,305 sqm.
- 5.69 As set out in the Design and Access Statement, amenity for residents is provided through a mix of private balconies and terraces, as well as external amenity space at first floor level between the two towers. In total, the development proposes 1853sqm of external amenity space, well in excess of the policy requirement. The external amenity space is also supplemented by internal amenity spaces on the first floor which front onto the outdoor spaces, providing a further 181sqm amenity space for residents.
- 5.70 There is no planning policy adopted requiring that residential flats are served by balconies or requiring them to be dual-aspect. Nonetheless, 133no. (59%) are served by balconies and 170no. (75%) are dual-aspect. Although some units are proposed to have a single aspect, the level of daylight to these units has been assessed in the daylight/sunlight/overshadowing report submitted with this application, referred to further below, and found to provide occupants with a good level of light and standard of amenity. Appropriate ventilation can be achieved through the inclusion of mechanical ventilation as set out in the sections below regarding air and noise quality.
- 5.71 Through the evolution of the design, thorough consideration has been given to the effects of the proposals on surrounding residential development to the east, west and north. To the east, across Goodman Place, are existing windows fronting onto an existing elevation of the Debenhams Store. Tower A has been designed to retain a blank elevation to these windows at first floor level to ensure no intervisibility between residential units, albeit above first floor level there are balconies in the east elevation. A visual assessment of this relationship can be seen in the Design and Access Statement. The units to the north and west are sufficiently offset across to mitigate any potential intervisibility. The effects of the development with regards to daylight/sunlight/overshadowing are addressed in the associated report, discussed further below.

#### Housing Mix and Size

- 5.72 Policy HO4 (Housing Size and Type) states that the Council will ensure that the size and type of housing reflects the needs of the community by requiring developments that propose four or more dwellings to include at least 80% of their total as one- or two-bedroom units.

House Type	Proposed Mix (No. and %)
1 bedroom	106 (47%)
2 bedrooms	120 (53%)
3 bedrooms	0
4+ bedrooms	0

- 5.73 Para 5.1 of the Council's Housing Size and Type SPD states that:

'The Council recognises that town centre residential schemes will usually be at a higher density in the form of flats and often as part of a mixed-use scheme. In these cases most of the dwellings will be one or two bedroom accommodation. Larger units providing family accommodation will usually be more appropriate in non-town centre locations.'

- 5.74 Given that 100% of the proposed mix is one- and two-bedroom apartments, the scheme accords with Policy H04 of the CS meaning the housing mix should be deemed acceptable. The site is considered to be in a suitable position for the specified housing mix given the town centre location. The specified housing mix will support both local policy and the growth of a diversified community within Staines. The combination of one- and two-bedroom dwellings is comprised of 5% 1B1P, 42% 1B2P, 29% 2B3P and 24% 2B4P.

- 5.75 The SPD on the Design of Residential Extensions and New Residential Development 2011 sets out minimum floorspace standards for new dwellings. These standards relate to single storey dwellings including flats, as set out below.

Minimum dwellings by floor area	Dwelling type (bedroom/persons)	Essential Gross Internal Area (m <sup>2</sup> )
Single storey dwelling including flats:	1b2p	50
	2b3p	61
	2b4p	70
	3b4p	74
	3b5p	86
	3b6p	95
	4b5p	90
	4b6p	99



- 5.76 The 1B1P dwellings within this proposal will be 45m<sup>2</sup> in size which is below the council's requirement of 50m<sup>2</sup>. However, the council does allow for studios of 30m<sup>2</sup> in size and therefore the 1B1P apartments exceed the size requirements for accommodation for the same number of residents.
- 5.77 Whilst not adopted by the Local Planning Authority, it is pertinent to note that the scheme is compliant with Nationally Described Space Standards (NDSS) requirements with 53% of the proposed dwelling sizes meeting the specified values as set within the standards. The remaining 47% of the dwellings exceed the NDSS requirements.
- 5.78 The NDSS requirement are set out within the table below:

Number of bedrooms(b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) <sup>2</sup>			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	

#### Affordable Housing and Viability

- 5.79 policy HO3 of the CS & P DPD requires the Council to negotiate for a proportion of up to 50% of housing to be affordable where the development comprises 15 or more dwellings. 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.
- 5.80 Policy HO3 further states that the '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.'
- 5.81 The proposed development is submitted seeking a residential use, albeit at this stage, it has not been determined whether the units would be delivered as Build-to-Rent or fractional sales. The operation of the building would be similar for both with charges for facilities and services either covered in rents or through service charges. The only element that would alter between the two types of tenure would be the resulting tenure of the affordable housing provision.

- 5.82 A viability Assessment has been submitted considering both tenure types. When undertaking a viability assessment good practice insists that one should start from a policy compliant assessment. An assessment has been undertaken for fractional sales including 50% affordable housing, split 65:35 between affordable rent and shared ownership at the values ascribed. The Residual Land Value arising from that appraisal was minus £7.1m. Clearly, that is not viable. In recent years the Council has received a number of viability assessments in which applicant pursued an application even though the Residual Land Value arising from the appraisal was less than zero. That is not the case here. It is not considered that a negative Residual Land Value to be consistent with a viable scheme.
- 5.83 In light of the above, a reduced the level of affordable housing has been considered which is consistent with the achievement of a viable Residual Land Value; that level being 10% - 23 units. This scheme generates a Residual Land Value of £2,392,000. Please note that, because these units would form part of a block and because it would not be possible to achieve distinct access and common parts, the nature of that affordable housing is Private Affordable Rent with the rent set at the level of 80% open market rent. If the rent were reduced below that level, the scheme value would be further reduced and a reduction in the level of affordable housing could be required.
- 5.84 An assessment was also undertaken of the scheme on a Build to Rent basis. In this scheme, the level of affordable housing was maintained, consistent with the previous assessment but, reduced the level of developer profit in order to maintain the Residual Land Value at roughly the same level as the “for sale” scheme (£2,142,000). The resultant level of profit (12%) is considerably lower than a developer would expect.
- 5.85 In light of the assessments undertaken, it is concluded that the maximum level of affordable housing the scheme could deliver on-site would be 10%, whether delivered as fractional sales or Built-to-Rent.

#### Heritage

- 5.86 The application is accompanied by a Built Heritage Assessment.
- 5.87 The assessment of the built heritage within, and in close proximity to the site, was undertaken to establish, as far as possible, the character of the historic built environment within the context of the proposed development site and to provide a description of significance in order to understand the potential impact of the proposals, including the potential impact on the setting on any nearby designated heritage assets and conservation areas. The heritage assets were identified within a 100m radius of the site. Within a 500m radius of the site, the number of designated heritage assets increases to 43 listed buildings, which are mainly located within Staines Conservation Area.

- 5.88 The existing building at the proposed development site was constructed in the 1960s as a purpose-built department store, initially used by Kennards before it changed into a Debenhams store. Before the construction of the former Debenhams building, a much earlier department store had occupied the site from the 1840s, known as Morford & Goodman.
- 5.89 The Staines Town Centre Conservation Area is located West of the site.
- 5.90 The listed buildings assessed within the Heritage Statement are as follows:
- The Blue Anchor Public House – Grade II\*
  - 44, 46 and 48, High Street – Grade II
- 5.91 The non-designated built heritage assets that were assessed are as follows:
- Former Angel Hotel (Turtle Bay), 26 High Street
  - Nationwide Bank, 28 and 30 High Street
  - Post Office and WHSmith, 49-51 High Street
  - 10-12 High Street
  - 1 Clarence Street
- 5.92 The proposed development at the Site will result in two instances of moderate effect on the setting of Staines Conservation Area and the grade II\* listed building at 13 and 15 Market Square and will have an overall negligible effect on the attributes of setting of other identified designated and non-designated heritage assets. Overall, the proposed development will have a negligible effect on key viewpoints of the designated and non-designated heritage assets within Staines Conservation Area. The proposed development may have an overall neutral impact on the built heritage assets identified within 100m of the Site.
- 5.93 The former department store holds low illustrative historical and low aesthetic value. Whilst the existing building within the Site currently enhances the streetscape of High Street and views along Clarence Street, the Site has been identified as a location suitable for high rise development. As required within Spelthorne Borough Council's Emerging Local Plan, the proposed development is of a high-quality design and improves the overall visual amenity of the Site. The prominent location of the Site at the street corner has been taken into consideration within the designs. The proposed development would therefore become a 'landmark' building and would contribute to the regeneration of the Town Centre.
- 5.94 The proposed development includes residential dwellings, which re-establishes the historic use of the Site as a residential area, and retail units, which will retain the retail frontage at High Street. There is therefore an opportunity to pick up the historical threads of the Site and

emphasise the time-depth of the Site by retaining some of the historic street names such as Goodman Place and potentially Canning's Yard within the new development, if appropriate.

#### Archaeology

- 5.95 This application is accompanied by an Archaeological Desk-Based Assessment.
- 5.96 The former Debenhams store is located within the Area of High Archaeological potential of Staines Historic Centre and Roman Town.
- 5.97 Land within the proposed development site is first captured on mid-18th century maps, which shows a row of buildings along the High Street frontage. By the mid-19th century, most of the proposed development site had been developed and consisted of independent shops, Morford & Goodman department store, and offices along the High Street. In 1973 the department store became a Debenhams store.
- 5.98 The potential for the site to contain buried archaeological remains is considered to be high, though the construction of a modern basement associated with the former Debenhams store will have had an impact on the survival of archaeological remains within the Site. It is likely that the modern basement will have at least removed 18<sup>th</sup> and 19<sup>th</sup>- century archaeological remains along High Street and Thames Street. Beyond the footprint of the modern basement, it is anticipated that extensive stratigraphy may survive within the Site. Remains may include prehistoric deposits or finds, Roman activity associated with the former town, buried post-medieval soils and structural remains of mid-19th century terraced houses.
- 5.99 It may be anticipated that further archaeological investigation, in the form of a programme of archaeological evaluation trenching or a watching brief, may be required to establish the presence or absence of buried archaeological remains and, if present, their extent and significance.

#### Highways and Access

- 5.100 The application is accompanied by a Transport Assessment and Travel Plan
- 5.101 Vehicular access to the proposed development would be provided through revisions to an existing vehicular access point onto the A308 Thames Street and retention of an existing service vehicle access onto Elmsleigh Road. The existing access onto Thames Street would be widened to facilitate two-way vehicle movements, and would be in the form of a dropped kerb crossing, providing priority to pedestrians and delineated using alternative materials.
- 5.102 The access proposals for the A308 Thames Street would involve relocating the existing bus layby further north along Thames Street. The bus stop would retain the length of the existing

access taper, the bus cage would be increased from 23m to 24m, facilitating 2no. 12m buses being able to stop at the same time without inhibiting in the carriageway, and the exit taper would be decreased from 20m to 15m which accords with current design guidance. Due to the location of the proposed building, there would be a wide footpath alongside the bus stop.

- 5.103 There are excellent opportunities for sustainable travel for residents of the proposed development, commensurate with the town centre location. There is good pedestrian infrastructure at the site, and the National Cycle Network Route 4 runs along the western site boundary. There are excellent opportunities for bus travel, as Staines Bus Station is less than 400m walk distance from the site and is served by numerous bus services to key destinations, including Ashford and London Heathrow Airport. Additionally, Staines railway station is within a 10-minute walk time from the site and is served by regular trains to key destinations including London Waterloo.
- 5.104 Overall, the site is accessible by all modes of travel and is therefore well located for residential development.
- 5.105 The proposed development would provide 151 car parking spaces, providing a ratio of 0.67 spaces per unit. Whilst the provision is fewer than the recommended minimum provision in accordance with the local planning authority supplementary planning guidance, the guidance is out-of-date and does not reflect current parking trends. However, it should be noted that the planning guidance states that reductions in parking requirements can be allowed in town centre locations where public transport accessibility is high.
- 5.106 The 2017 Committee Report for Phase 1B of the Charter Square scheme acknowledged that a parking ratio of 0.67 is acceptable, the application was later approved on these grounds. Reference was made to the 2011 census data which indicated that 35% of the central Staines residential population are car free.
- 5.107 It is therefore considered that a reduction in parking requirements is appropriate in this instance in light of the highly sustainable location. Additionally, a car club is proposed for residents of the site to reduce the demand for car parking spaces at the site. Typical figures indicate that a car club of between 4 and 10 vehicles could reduce car parking demand at the development by between 74 and 185 vehicles. In accordance with guidance from the Local Highway Authority, 20% of the car parking spaces will be provided with fast charging EV units and a further 20% of spaces will be provided with a power connection to future proof the development in a greater uptake of EV units.
- 5.108 Initially, four Car Club vehicles will be provided within the development car park for residents. The car club will be managed by CoMoUK accredited operators and use of the car club will be monitored for a minimum period of five years, with the site developer committing funds to allow

up to 10 car club vehicles to be provided on site. Promotion of the car club will be included within the resident welcome pack and, as an incentive for residents, each household will be offered their first five car club trips for free.

- 5.109 Residents will be encouraged to car share through information contained within the Welcome Pack. By registering with the websites provided within the welcome pack, individuals can search for other car sharers. Car sharing relationships formed over internet sites allow residents to take advantage of a wider group of people with whom to car share, by enabling them to car share with people from different areas.
- 5.110 The proposed development will be served by 226 cycle parking spaces along the Thames Street frontage. The cycle parking would be complimented by a workshop/social hub area to encourage use and interaction between residents.
- 5.111 A traffic generation exercise has been undertaken for the proposed development which indicates that the proposals would generate 24 to 38 vehicle trips (two-way) during the typical weekday peak hour. This level of traffic generation would have a negligible impact on the local highway network and therefore detailed analysis of any off-site junctions is not required.
- 5.112 A Travel Plan Statement has been prepared to accompany this Transport Assessment which provides information on the accessibility of the site by sustainable travel modes. The plan also discusses the measures that will be implemented by the site developers to ensure that residents and visitors to the development are provided with relevant information on sustainable travel options, thus reducing the number of vehicle trips to and from the site.
- 5.113 An action plan for implementing the Travel Plan containing initiatives for the development has been set out and will be supported by the developer for a minimum five-year period from occupation of the site. The five-year long support will give the initiatives sufficient time to embed the ethics of 'greener travel' and should promote greater awareness of travel choice.
- 5.114 The action plan for implementing the Travel Plan is provided in the table below:

Action	Timescales	Responsibility
Identify Travel Plan Coordinator	Appointment of management company and prior to first occupation	Developer / Management Company
Travel information for prospective Residents	Marketing information for site	Developer / TPC
Welcome Pack for residents	Issued to residents upon occupation	TPC
Cycle parking	Prior to first occupation	Developer
Pedestrian/cycle access	Prior to first occupation	Developer
Provision of four car club vehicles	Prior to first occupation	Developer
Provision of electric vehicle	Prior to first occupation	Developer

charging points		
Provision of public transport information	Part of Welcome Pack	TPC
Monitoring of car club	Ongoing	TPC / Management Company

5.115 In view of the above, it is considered that the proposed development would not have an unacceptable impact on highway safety, and that the residual cumulative impacts on the road network would not be severe. The site can be accessed by all modes of travel and thus is in a sustainable location for residential development. There is therefore no reason for refusal of the proposals on highway grounds.

### Noise

5.116 A detailed environmental noise survey has been undertaken in order to establish the currently prevailing environmental noise climate around the site. The environmental noise impact upon the proposed dwellings has been assessed in the context of national and local planning policies.

5.117 An Overheating Assessment has been undertaken also and will accompany this planning application.

5.118 Appropriate target internal noise levels have been proposed for the residential units as well as amenity areas. Noise levels in residential units can be achieved using conventional mitigation measures, including the use of suitably specified glazing and acoustically attenuated ventilation. The proposal has been designed with mechanical ventilation to flats in accordance with the required mitigation so windows can remain closed other than for purge ventilation. The specification of the glazing can be achieved and should be secured by way of a planning condition. The mechanical ventilation to be provided can be found in the submitted Ventilation Strategy.

5.119 In order to achieve appropriate noise levels on the roof top amenity area, a parapet is proposed along the Thames Street frontage.

5.120 Subject to appropriate mitigation measures, as included within the proposals, the development is suitable for residential development with regards to noise.

### Air Quality

5.121 An Air Quality Assessment was undertaken in order to determine baseline conditions, consider site suitability for the proposed end-use and assess potential impacts as a result of the scheme.

- 5.122 An Overheating Assessment has been undertaken also and will accompany this planning application.
- 5.123 Potential construction phase air quality impacts from fugitive dust emissions were assessed as a result of demolition, earthworks, construction and trackout activities. It is considered that the use of good practice control measures would provide suitable mitigation for a development of this size and nature and reduce potential impacts to an acceptable level.
- 5.124 Potential impacts during the operational phase of the proposals may occur due to road traffic exhaust emissions associated with vehicles travelling to and from the site. Dispersion modelling was therefore undertaken in order to predict pollutant concentrations at sensitive locations as a result of emissions from the local highway network both with and without the development in place. Results were subsequently verified using local monitoring data.
- 5.125 The dispersion modelling assessment indicated that predicted air quality impacts as a result of traffic generated by the development were not significant at any sensitive location in the vicinity of the site.
- 5.126 The results of the dispersion modelling assessment indicated elevated pollution levels at residential locations across the first and second floor of the development. As such, suitable mitigation in the form of mechanical ventilation has been included, as set out in the Ventilation Strategy accompanying this application.
- 5.127 Based on the assessment results, air quality factors are not considered a constraint to planning consent for the development.

#### Flood risk and Drainage Strategy

- 5.128 The planning application is accompanied by a Flood Risk and Drainage Strategy.
- 5.129 The site has been found to not be at any direct flood risk from flooding associated with fluvial, sewer or groundwater sources. The development site is predominantly within Flood Zone 1, with some encroachment of Flood Zone 2 associated with the River Thames into the south-west corner, where topographic levels are lowest. The residential elements of the development proposals are significantly elevated above the modelled flood levels, and so the residual risk to future site users is deemed to be minimal.
- 5.130 The latest available modelled flood extents for the River Thames have been obtained from the Environment Agency. These show that the 1 in 100 year plus climate change flood level is at 15.753m AOD which is 125mm above the proposed access level off Thames Street. As such a minor ramped access set a level of 15.80m AOD is provided off the main site entrance to prevent flood waters during an extreme event from entering the basement car parking.



- 5.131 Other mitigation measures including the use of flood resilient materials and the raising of electrical circuits above anticipated flood levels in the bike/ workshop area, refuse holding area and plant rooms on the ground floor level have been included.
- 5.132 The EA mapping shows that there is minimal risk of surface water flooding, and a limited risk of flooding from reservoir and other artificial sources. The site was shown to be within an area of high susceptibility to groundwater flooding.
- 5.133 The surface water discharge strategy has been considered, and a calculation of the anticipated discharge rates and attenuation volumes has been carried out. A restricted discharge rate of 5l/s for all runoff from the development site has been agreed with Thames Water. Runoff will be conveyed offsite using the existing connections into the Thames Water storm sewer, subject to ongoing consultation with Thames Water.
- 5.134 Attenuation is proposed via the use of two below ground storage tanks located beneath the site frontage along Thames Street, adjacent to the eastern boundary, and within the secondary access point off Elmsleigh Road. An overall surface water calculation has been undertaken, and a tank feature has been designed to attenuate surface water runoff for all storm events up to and including the 1 in 100 year plus 40% climate change storm event.
- 5.135 Foul effluent shall also be discharged offsite using the existing connections into the Thames Water sewer within Thames Street to the west. Thames Water in their Pre-Planning Enquiry response have confirmed that there is sufficient capacity within the adopted sewer network to accommodate foul flows from the development.

#### Energy and Sustainability

- 5.136 Policy CC1 sets out that the Council will support the provision of renewable energy, energy efficiency and promote sustainable development generally by: a) requiring residential development of one or more dwellings and other development involving new building or extensions exceeding 100m<sup>2</sup> to include measures to provide at least 10% of the development's energy demand from on-site renewable energy sources unless it can be shown that it would seriously threaten the viability of the development.
- 5.137 The planning application is accompanied by an Energy and Sustainability Statement. The approach towards achieving energy efficiency is as follows:
- Reduce energy demand – Use passive design measures and optimise the building in terms of orientation, air tightness and insulation levels.
  - Meet demands efficiently – Specification of energy efficient plant, heating, ventilation, lighting and controls to enable efficient operation.

- 5.138 By taking a “fabric first” approach to the development it focuses effort on the choice of materials to improve on U values, reduce thermal bridging, improve on air tightness targets, install energy efficient services providing an energy efficient building using less energy and reducing overall CO2 emissions.
- 5.139 The proposals have also made improvements on the building regulations for U-values of between 32% and 52%. (see Statement for full details). Furthermore, with regards to air tightness, the development proposes a 60% improvement over the minimum air tightness regulations.
- 5.140 Dedicated low energy lighting shall be provided for 100% of the internal space, consisting of low energy high efficiency fluorescent lamps and LED luminaires.
- 5.141 In terms of water efficiency, for the Residential element the design is targeting a consumption of 125 l/p/d as required by Part G of the Building Regulations, 2015 edition with 2016 amendments. To achieve this the following restrictions on sanitaryware appliances and fittings shall be considered to ensure water energy efficiency target per person is achievable:
- WCs 4/2 litres dual flush (maximum 3 litres effective flushing volume)
  - Showers  $\leq$  6 litres/min
  - Baths  $\leq$  170 litres
  - Basin taps  $\leq$  5 litres /min
  - Kitchen sink taps  $\leq$  6 litres/min
  - Dishwashers  $\leq$  1.25 litres/min
  - Washing Machines  $\leq$  8.17 litres/kilogram
- 5.142 A feasibility study of available renewable technologies has been undertaken to determine which are suitable for inclusion within the proposals. The technologies considered are as follows:
- Solar Panels
  - Heat Pumps
  - Wind Turbines
  - Biofuel Community Heating Scheme
  - Biofuel Combined Heat and Power
  - Fuel Cells
  - District Heating Network
- 5.143 The feasibility study has determined that the most appropriate energy strategy for the proposals is as follows:

- Decentralised standalone apartment ASHP Hot Water Cylinders for Residential Apartments.
- Decentralised Point of use electric hot water for amenity spaces.
- Decentralised MVHR Ventilation
- Decentralised MVHR for amenity spaces
- Electric Panel Heaters with thermostat and timeclock control

5.144 Initial calculations have been carried out in order to demonstrate predicted energy saving and predicted carbon emission savings as follows.

5.145 Energy demand:

Summary Table	Regulated Energy Demand (MWh/year)		
	Domestic		Sitewide
<b>Total Baseline (Building Regulations 2013)</b>	593.26	89.53	682.78
<b>Development Energy Strategy</b>	425.66	83.11	508.77
<b>Reduction Achieved</b>	28.25%	7.17%	25.49%

5.146 Carbon emissions:

Summary Table	Regulated CO2 Emissions (tonnes/year)		
	Domestic		Sitewide
<b>Total Baseline (Building Regulations 2013)</b>	307.9	46.46	354.36
<b>Development Energy Strategy</b>	220.92	43.13	264.05

<b>Reduction Achieved</b>	28.25%	7%	25%
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- 5.147 A decentralised Air Source Heat Pump system has been considered as feasible and the most suitable for inclusion as part of this development. 25% of energy demand will be generated from renewables, exceeding the policy requirement.
- 5.148 There will be no gas connections as part of the development with all residential units being served by electric connections only. All residential units will have an individual power supply providing choice of energy supplier and therefore the ability to opt for a renewable energy only supplier if they choose.

#### Daylight/Sunlight/Overshadowing

- 5.149 The effect of the proposals on daylight, sunlight and overshadowing has been assessed. The provision of daylight to the lower floors of the proposal was assessed along with the potential effects of the proposals on daylight and sunlight to surrounding residential properties.
- 5.150 Assessments were conducted using the methodologies recommended in the Building Research Establishment guide, although it should be noted that the Local Planning Authority do not have a detailed policy setting out a standard approach to assessing the effects of daylight, sunlight and overshadowing. The advice contained in the Building Research Establishment guide is not mandatory and its numerical guidelines should be interpreted flexibly.
- 5.151 The internal daylight adequacy analysis of the habitable rooms within the scheme demonstrates full compliance with the average daylight factor assessment criteria, whether single or dual aspect and having regard to the direction they face.
- 5.152 The neighbouring daylight studies demonstrates that 76% of windows assessed will comply or experience only low adverse reductions only in vertical sky component terms and 95% of rooms will comply or experience only low adverse reductions only in no skyline terms.
- 5.153 The average retained vertical sky component figure around the site is 23.6% and the average retained no skyline figure is 86.1% which demonstrates that despite reductions in the access to daylight that the amount of retained light remains at very good levels for the neighbours within the vicinity of the site and commensurate that seen in typical urban context areas such as this.
- 5.154 The neighbouring sunlight analysis demonstrates that 92% of rooms assessed will comfortably comply with the annual probable sunlight hours with only two isolated infringements of the guidelines.

- 5.155 The two infringements to the sunlight criteria are isolated to a single property. Whilst there will be 2 isolated infringements within this property, the four other rooms assessed will experience gains in their sunlight access. The reductions will be to two bedrooms whilst the gains will be to two living rooms and two bedrooms. Overall, the property will experience a net gain in its access to sunlight.
- 5.156 Overall, therefore the impacts in sunlight terms are considered negligible.
- 5.157 In conclusion, it is submitted that the layout of the proposed development is consistent with the Council's local planning policy on daylight and sunlight, particularly having regard to paragraph 123(c) of the National Planning Policy Framework.

#### Wind and Microclimate

- 5.158 To assess the effects of the proposals on wind and microclimate A Computational Fluid Dynamics (CFD) based desk top analysis wind microclimate study has been carried out by FD Global Limited (FDG) to provide an assessment of the pedestrian level wind environment for the proposed redevelopment.
- 5.159 The study has considered the wind regime for existing and proposed site conditions and incorporates the generic wind climate at the site based on long-term wind statistics that have been manipulated using industry standard models of the Atmospheric Boundary Layer (ABL). The potential for the proposed development to impact the ground level wind microclimate in the proposed site conditions has been explored for existing surrounding conditions and also with future developments that form the cumulative context.
- 5.160 The assessment utilises the Lawson Criteria, an industry standard for assessing effects. The comfort criteria are based on a 5% time exceedance of the threshold wind speeds, that relate to tolerable wind conditions for categorised types of pedestrian activity. It is conventional to apply these criteria on a seasonal basis considering summer and worst case seasonal comfort ratings.
- 5.161 The main findings of the report are set out below.
- 5.162 The assessment has shown that the likely impact of the proposed development in the public realm at ground level is such that the wind microclimate overall remains as being suitable for the planned pedestrian uses throughout the site for existing site context in the public realm at ground level.
- 5.163 There is a very localised Major Impact in the proposed site conditions at the corner of High Street and Goodman Place that requires purposely arranged wind mitigation measures that have been incorporated in design. These have been developed in concept and the key

components are incorporated in the application scheme such that the residual impact with the mitigation measures in place is classified as Moderate and requires no further mitigation.

5.164 There are localised Major Impacts in the proposed site conditions in the elevated amenity spaces that requires purposely arranged wind mitigation measures that have been incorporated in the design. These have been developed in concept and the key components are incorporated in the application scheme such that the residual impact with the mitigation measures in place is classified as Moderate and requires no further mitigation.

5.165 It can also be seen in the assessment that with mitigation measures in place, the extent of the podium level terraces for which the wind comfort is suitable for outdoor recreation in winter is for more than 75% of the time has been substantially increased. For the summer period the wind comfort is suitable for outdoor recreation for the majority of the podium level space for 75% – 80% of the time.

#### Aerodrome Safeguarding

5.166 The application is accompanied by an Aerodrome Safeguarding Assessment considering the effects of the proposal on London Heathrow airport.

5.167 The main findings of the study are as follows:

#### 5.168 Physical Safeguarding

- The proposed development lies within the inner horizontal surface of the Obstacle Limitation Surfaces (OLS);
- The inner horizontal surface has an elevation of 67.95m Above Mean Sea Level (AMSL);
- Since the proposed development has a maximum elevation of 66.07m AMSL, the OLS will not be infringed.

#### 5.169 IFP Safeguarding

- The IFP safeguarding assessment found that the development, with a maximum elevation of 67.00m, AMSL, and a radius of 30.00m, does not impact HAL's IFPs.

#### 5.170 Technical Safeguarding

- The proposed development will not infringe the safeguarded surfaces of the Instrument Landing System Localiser, Glidepath or Distance Measuring Equipment facilities. The proposed development will have no impact on these facilities;

- The proposed development will not infringe the safeguarded areas of the Very High Frequency Omni-directional Range and Non-directional Beacon facilities that support operations at Heathrow. No further consideration of these facilities is necessary;
- The proposed development will be illuminated by the Primary Surveillance Radar (PSR)/ Secondary Surveillance Radar (SSR);
- The proposed development lies well away from the PSR and SSR sterile zones, and it will not affect PSR or SSR beam formation;
- A simulation of radar coverage assessed at 1000ft to 60 Nautical Miles indicates that the proposed development will have no impact on PSR or SSR coverage;
- PSR/SSR reflections are not expected to generate false targets, however, should NATS object on the grounds of SSR false targets then mitigation is available. The Raytheon SSR has integrated processing features for dealing with reflecting surfaces. If the proposed buildings are found to generate false targets, their position will be stored in a reflector file. Optimisation of the SSR would be required to store the reflector file permanently.

5.171 In light of the findings of the Aerodrome Assessment, the proposals will not adversely affect the safe operation of London Heathrow airport.

#### Telecommunications

5.172 A Telecommunications Impact Assessment has been undertaken to consider the effects of the proposals on existing infrastructure for telecommunications.

5.173 The following operators have confirmed they have no objection to the development:

- Telefonica (including O2).
- Arqiva.
- Mobile Broadband Network Limited (MBNL), which is joint venture between Everything Everywhere (EE) and Three.
- The Joint Radio Company (JRC) on behalf of Southern Electric and National Grid Gas Networks.
- Vodafone.
- British Telecom (BT).

5.174 In light of the lack of effects identifying by the consulted telecommunications operators, no mitigation is required for the proposals.

#### Fire Strategy

- 5.175 A Fire Statement has been prepared to accompany the application.
- 5.176 The Fire Statement demonstrates that due regard has been given to fire safety as the proposals have evolved, in accordance with national requirements.

#### Planning Balance

- 5.177 Paragraph 2 of the NPPF reiterates that planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. The National Planning Policy Framework must be taken into account in preparing the development plan, and is a material consideration in planning decisions.
- 5.178 In the above paragraphs it has been demonstrated that the proposed development would accord with the relevant policies of the Development Plan and is supported by other material planning considerations.
- 5.179 Paragraph 8 of the NPPF sets out that achieving sustainable development means that the planning system has three overarching objectives which are interdependent and need to be pursued in mutually supportive ways. The proposed development would meet the three objectives in the following ways:
- 5.180 Economic objective – the proposed development would help build a strong and competitive economy, by supporting retail provision and the economy of Staines town centre through the provision of a retail and mixed-use with residential dwellings being provided above the High Street encouraging use of existing shops. The proposal would permanently create part-time and full-time jobs in both the retail elements and the management of the residential buildings, notably increased if coming forward as a Build-to-Rent scheme. Investment in the construction of the development is estimated to be circa £53,000,000. The local community would directly benefit through job creation. Furthermore, use of contractors and suppliers would be secured which indirectly create and sustain further jobs. The proposed development would have significant economic benefits.
- 5.181 Social objective – the proposed development would make a significant and valuable contribution to the Council's housing land supply and delivery of homes in an accessible location and through a supported tenure types suitable to the location. The high-quality amenities proposed would support strong, vibrant and healthy communities, by fostering a well-designed and safe built environment, encouraging residents to engage with one another and interact socially. Consideration has been given to surveillance of the site to ensure security and safety of users. The proposed development has significant social benefits.



- 5.182 Environmental objective – the proposal would contribute to enhancing the built environment through the regeneration of a vacant site comprising a building of low aesthetic value which is no longer fit for purpose. Development would complement the character of the surrounding area providing a development of the highest architectural quality with landscaping enhancing the public and private realms. There would be less-than-substantial effect on limited designated heritage assets; that are outweighed by public benefits. Improved surface water drainage accounting for climate change would reduce the risk of surface water flooding in the surrounding area and the proposal would result in a net gain on ecology and biodiversity. The development would result in lesser vehicle movements whilst encouraging walking and cycling. The proposed development would have moderate environmental benefits.
- 5.183 In light of the above, it should be considered that the proposed development accords with the relevant policies of the Development Plan and the NPPF as a whole in seeking to deliver sustainable development.

## 6. Conclusion

- 6.1 Cerda Planning Limited has been instructed by Future High Street Living (Staines) Ltd to act on their behalf in respect of submitting a full planning application for the erection of Demolition of the former Debenhams Store and redevelopment of site to provide 226 dwellings (Use Class C3) and commercial units (Use Class E) together with car and cycle parking, hard and soft landscaping, amenity space and other associated infrastructure and works.
- 6.2 In addition to this Planning Statement the application is informed and accompanied by the following;
- Site Layout and all other necessary plans prepared by Corstorphine & Wright
  - Design and Access Statement prepared by Corstorphine & Wright
  - Contaminated Land Report prepared by Apex Consulting Engineers
  - Landscape Strategy prepared by Fira Landscape
  - Urban Landscape Visual Assessment prepared by Salfords
  - Heritage Statement prepared by Salfords
  - Transport Assessment prepared by ADC Infrastructure
  - Travel Plan prepared by ADC Infrastructure
  - Lighting Impact Assessment prepared by Vitec Consult
  - Wind & Micro-climate Assessment prepared by FDGLOBAL
  - Fire Statement prepared by Ashton Fire
  - Renewable Energy Statement prepared by Vitec Consult (includes an Overheating Assessment)
  - Air Quality Assessment prepared by Redmore Environmental
  - Flood Risk and Drainage Strategy prepared by ADC Infrastructure
  - Daylight/ Sunlight/ Shadowing Assessment prepared by Delva Patman Redler
  - Noise Assessment prepared by Hann Tucker
  - Tele-communications Impact Assessment prepared by Pager Power
  - Viability Assessment prepared by Bailey Venning
  - Aerodrome Safeguarding Report prepared by Cyrrus
  - Ventilation & Flues Strategy Report prepared by Vitec Consult
  - Utilities Assessment prepared by Vitec Consult
  - Archaeological Assessment prepared by Salfords
  - Statement of Community Involvement prepared by Cerda Planning Limited.
- 6.3 This statement has set out both the site and project context and discusses the particular characteristics of the application site and the broad detail of the proposed scheme.

- 6.4 Staines is designated in the adopted local plan as being a 'Secondary Regional Centre'; the most sustainable of all town centres in Spelthorne. In addition, the site is allocated for mixed-use development within the Preferred Options Site Allocations Document (2019) as part of the emerging Local Plan. Furthermore, the provision of residential development in a highly sustainable location must be considered in the current context of the Local Planning Authority being unable to demonstrate the minimum requirement of five-years' housing land supply and having failed to deliver housing to meet the identified need over the past three years, achieving only 50% against the Housing Delivery Test.
- 6.5 With regards to the design, the massing of the building has been taken into consideration and has been broken down to compliment the existing character of the Site. The proposed buildings have been articulated into base middle and top to break down the façade and the crown at the top breaks down the massing. The proposed development responds to the present geometry through the incorporation of a chamfered corner and the use of the podium connecting the two towers. The base will include shops along High Street, which will fit in with the context of the surrounding streetscape. Other aspects of the development, such as the colour and texture, are more in keeping with the wider townscape.
- 6.6 The building sits at a key juncture of Thames Street, High Street and Clarence Street offering an opportunity to create a landmark building which assist in place-making, emphasising the importance of the place and playing a positive urban design role in the built form, positively contributing to views and the skyline.
- 6.7 The planning application is supported by evidence which demonstrates there are no technical constraints to developing the application site and the proposals accord with the relevant policies of the Development Plan. Notwithstanding this, the presumption in favour of sustainable development applies as set out in paragraph 11d) whereby permission should be granted unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits. In this instance, there are limited instances of harm, to be considered against significant public benefits.
- 6.8 In light of the above, it is respectfully requested that planning permission be granted without delay.