



Nathaniel Lichfield  
& Partners

Planning. Design. Economics.

**Dudley House**

**Planning Statement**

STS Group Investments

28 July 2016

14975/MH/ZS

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## 1.0 Introduction

- 1.1 Nathaniel Lichfield and Partners (NLP) has prepared this Planning Statement on behalf of STS Group Investments (the applicant) to accompany its application for full planning permission (FPP) for the change of use of a vacant care home at Dudley House, The Grove, Isleworth. The application seeks permission for the:

*“Change of use from C2 nursing home to C3 dwellinghouses to provide 17 flats. Works to include a single storey extension at roof level, a 2 storey extension to the rear and associated parking and landscaping works”.*

- 1.2 This Statement describes the site and the proposed development, and assesses the proposal against borough, London and national planning policies and other material considerations. In doing this, it draws from other documents and information accompanying this application.

## Accompanying Documents

- 1.3 In addition to this Planning Statement and the plans and drawings, the application is also accompanied by the following accompanying documentation:

- Design, Access and Heritage Statement prepared by Mulhern Iremonger Design Studios
- Architectural Drawings (see schedule 1 of Cover Letter);
- Statement of Community Involvement prepared by NLP;
- Financial Viability Assessment prepared by Cluttons;
- Draft Construction Management Plan prepared by STS Group Investments ;
- Energy Statement prepared by Norman Disney & Young;
- Sustainability Statement prepared by Norman Disney & Young; and
- Daylight and Sunlight Report prepared by Norman Disney & Young

## Structure of Statement

- 1.4 This Planning Statement comprises the following sections:
- Section 2 describes the site and surrounding area;
  - Section 3 sets out the planning history of the site and surrounding area;
  - Section 4 provides a brief overview of the proposal;
  - Section 5 identifies key relevant national, London-wide and local planning policies and guidance;
  - Section 6 assesses the application proposals against the development plan policies set out in Section 5 and other material considerations;

- Section 7 provides a summary and conclusions in respect of the overall regeneration and planning benefits of the scheme and compliance with planning policies.

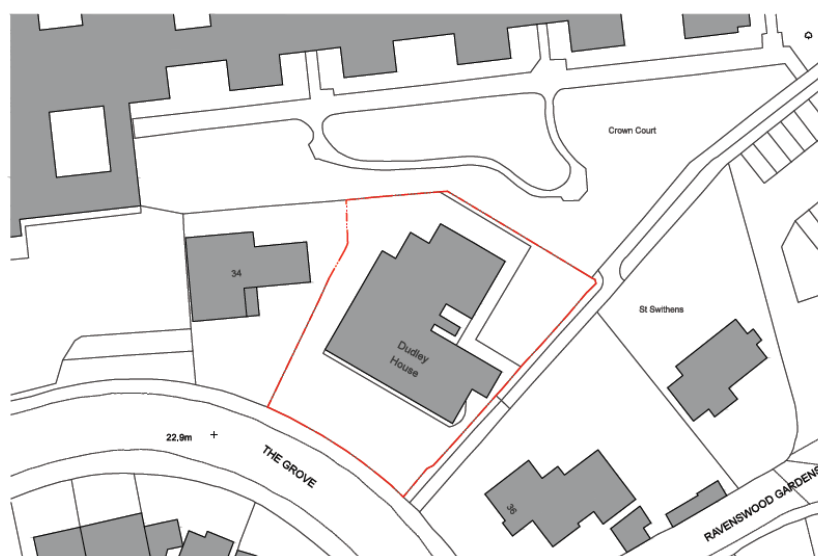
2.0

## Site and Surroundings

### Site Location and Description

- 2.1 The site is located on the north east side of The Grove, Isleworth. It extends to approximately 540sqm and comprises a vacant care home, with a floor area of approximately 1150sqm. The care home previously provided accommodation for between 30 and 40 residents with communal spaces and facilities but has been vacant for approximately 2 years.
- 2.2 Dudley House is located between two residential properties, no.34 and no.36 The Grove. A Public Right of Way footpath exists along the eastern boundary of the site connecting The Grove to the Crown Court.
- 2.3 The existing building is a three-storey red brick building, set back from the main road. The building is irregular in shape, with a large proportion of the existing building extending to the rear, away from The Grove. The immediate and wider surrounding area is predominantly in residential use (use class C3).
- 2.4 The site benefits from existing access from The Grove as shown on the enclosed Location Plan (ref.1602.2/05).

Figure 2.1 Block Plan (ref. 1602.2/001)



- 2.5 The site is located within the Spring Grove Conservation Area which was designated in 2002. The Lodge, a Grade II Listed Building (The Lodge) located on The Grove and designated in 2002, along with a number of locally listed buildings (identified as numbers 811, 812, 852 and 853 and located to the south of the application site) all contribute to the character of the Conservation Area.
- 2.6 The property itself is flanked on all sides by a number of trees. The status of these trees and the presence of any Tree Preservation Orders (TPOs) is unclear, however, it is noted that all trees on site would be protected from

felling without Local Authority approval by virtue of their location with a Conservation Area.

- 2.7 According to the Environment Agency Online Flood Risk Maps, the site is located in Flood Zone 1 i.e. an area at very low risk of flooding.
- 2.8 In terms of accessibility, the site is located to the north of the A315 (London Road), 500m from Isleworth train station (served by South West Trains) and 1.1km from Osterley Tube Station (this is served by the Heathrow branch of the Piccadilly Line). The area well provided by local bus routes, though it is noted that these do not operate along The Grove. Along the A315 (London Road) to the south of the site, including numbers 110, 117, 235, 237, 635 and N9 with connections to White City, Brentford, Cranford, Feltham, Hanwell, Sunbury and Staines. The site has a PTAL rating of 3.



3.0

## Relevant Planning History

3.1

This section outlines the relevant planning history of the site and that of the surrounding area.

### Site Planning History

3.2

The established use of the site, as understood from the planning history, is as a residential institution (use class C2)/nursing home. The use of the building as a nursing home was approved on 29<sup>th</sup> January 1986, planning application reference 00523/C/P3

3.3

It is understood the building has been used continually since 1986 as a residential care home. As such, much of the planning history of the site relates to this use. As can be seen in Table 3.1, since 2001 a number of planning applications were submitted for a variety of works to Dudley House, The Grove, the majority of which were associated with the operational requirements of the nursing home.

Table 3.1 Planning History

Application Ref.	Description	Decision
P/2015/2994	Removal of Condition 3 of planning permission 00523/C/P3 dated 29/01/1986 for use of premises as elderly person's residential nursing home and erection of single storey extension to provide enlarged dayrooms and 3 storey Extension comprising WC and storage accommodation.	Withdrawn 28/08/2015
P/2015/3166	Removal of Condition 3 of planning permission 00523/C/P3 dated 29/01/1986 for use of premises as elderly person's residential nursing home and erection of single storey extension to provide enlarged dayrooms and 3 storey Extension comprising WC and storage accommodation	Withdrawn 12/08/2015
P/2004/3342	Erection of a 3 storey lift tower to south east side of existing building. (Amended Plans)	Approved 04/03/2005

Application Ref.	Description	Decision
P/2002/2285	Erection of two storey detached building for use as staff room, laundry and storage area with associated parking to existing nursing home.	Refused 15/01/2003 Appeal Dismissed 21/08/2003
P/2002/1185	Erection of two storey detached building for use as staff room, laundry and storage area with associated parking to existing nursing home.	Refused 25/07/2002
P/2001/0788	Erection of single storey rear extension to Nursing Home	Approved 18/05/2001
Ref unknown*	Erection of 3 storey extension	Granted 1989
Ref unknown*	Erection of 3 storey extension	Granted 1988
Ref unknown*	Erection of 3 storey extension including lift	Granted 1988
Ref unknown*	Erection of open sided front entrance porch	Granted 1986
00523/C/P3	Use of premises as residential nursing home	Granted 1986
Ref unknown*	Use of premises as B&B	Refused 1985
Ref unknown*	Use of premises as OAP Home	Granted 1985

\* Taken from Officer Report to Planning Committee 3 March 2005 (appn. ref. P/2004/3342)

3.4

It is understood the nursing home has now ceased to operate and the site has been vacant for in excess of two years. Two planning applications were submitted in 2015 to the London Borough of Hounslow for consideration for the removal of condition 3 of planning permission ref. 00523/C/P3. These applications were made in order to provide greater flexibility in the use of the property. We understand that both of these were withdrawn in August 2015 following advice from the Council that the proposals would not be accepted.

## 4.0 Development Proposals

4.1 This application seeks full planning permission for:

*“Change of use from C2 nursing home to C3 dwellinghouses to provide 17 flats. Works to include a single storey extension at roof level, a 2 storey extension to the rear and associated parking and landscaping works”.*

### **Residential Units**

4.2 The proposed scheme seeks to provide 17 flats and will comprise of: 9 x 1 bedroom, 6 x 2 bedroom and 2 x 3 bedroom flats at Dudley House.

4.3 Two stairwells will provide access to the units at first, second and third floors. As per the existing arrangement, a lift will also be provided.

4.4 All flats have also been designed in accordance with Lifetime Homes Standards (see pages 6 and 7 of Design, Access and Heritage Statement for further details), the National Described Space Standards and the London Housing Supplementary Planning Guidance (SPG) (excluding flat no. 4).

### **Wheelchair Accessible unit**

4.5 At ground floor level, flat 03 has been specifically designed as a wheelchair accessible unit. It is ideally located in close proximity to the wheelchair accessible parking space. The front of the building is accessed via two steps, making step free access difficult to achieve without a significant ramp and alterations to the front of the building and forecourt. As such the proposed wheelchair accessible unit (and parking space) will be located to the rear of the property (Flat 3), near to the rear entrance.

4.6 In order to ensure ease of access, the rear entrance has been adapted to allow for access via a gently sloping ramp and to reduce the number of entrance door needing to be passed through (this flat will only need to pass through one entrance door to access the dwelling). Flat 3 has also been provided with its own cycle storage to easily accommodate storage and access. Please see drawing no. 1602.3/005 for further information on Flat 03, including; WC layout & dimensions, circulation, turning circles, nib clearances, door openings, corridor widths, etc.

### **Roof Extension**

4.7 The development proposals seeks to extend the existing unit at roof level by a single storey, this will be set back from the main front façade by 2.8m and will be clad in pre-weathered zinc with standing seam-roofing system. The roof extension is proposed to be dark-grey in colour, to give the impression of a slate roof (currently in place) at roof level and was the stated preferred material of the Council (as advised in pre-application letter dated 17<sup>th</sup> February 2016). The new roof extension will be set back from both the front (south facing

elevation) and side (west facing elevation) to ensure it is less visible from street view in line with the conservation area guidelines.

- 4.8 Solar panels are proposed to be installed on the roof of the development covering approximately 65sqm.

## **Rear Extension**

- 4.9 To the rear of the property the development proposals seek to erect a two-storey extension to the existing one storey extension. This will match the height and appearance of the main building. This is proposed to be constructed in red brick to match the existing brickwork in both bond and mortar joint, with corbelled parapet at roof level to be rendered and painted white.

## **Elevational Changes**

### **South**

- 4.10 With regards to the south elevation (fronting onto The Grove), the development scheme proposes to replace the existing windows at first and second floor level with new UPVC French doors. These are designed to match the three existing UPVC French doors at first floor level. Two new UPVC French doors are also proposed at first and second floor. Timber shutters will be provided for each of the French doors at ground, first and second floor levels. The existing balcony at first floor will be extended in order to create more private external amenity space and to provide greater aesthetic symmetry to the building elevation. This will be replicated at second floor level and both will be provided with a black metal balustrade. A new vertical opening comprising a frameless glass window is also proposed in order to give additional light to the front stairwell.
- 4.11 The single storey roof extension will be set back from the south elevation by 2.8m making its impact on the conservation area almost negligible. Five windows and a terrace area will be provided at roof level.

### **North**

- 4.12 As stated above, the development proposals seek to replace the existing single storey extension with a three-storey extension which will match the height and appearance of the main building. Within this extension, four windows are proposed on the north elevation. The roof of the extension will be used as a communal roof terrace (55sqm) and a private terrace for the occupants of Flat No. 16.

### **East**

- 4.13 As above, the east elevation will be altered with the replacement of the existing single storey extension with a three-storey extension. The windows provided on this new extension will be double height windows and will open inwards.

- 4.14 A new access door will also be installed on the existing building, replacing an existing window.

### **West**

- 4.15 On western elevation, the development proposals do not seek to provide any additional windows or openings, apart from those associated with the roof extension. The existing windows will, however, have the cill level lowered to allow for the insertion of new French doors and Juliette balconies.
- 4.16 No external amenity space is proposed along this elevation in order to keep overlooking, noise / disturbance to no.34 to a minimum. It is noted that large French doors opening outwards are already installed at ground floor level along this elevation.

### **Amenity Space**

- 4.17 Of the 17 flats to be provided, 13 units will not have access to any private external amenity space due to the constraints associated with refurbishing a listed building. Four flats (nos. 09, 14, 16 and 17) will have access to a private terrace of at least 10sqm (per flat). All flats will have access to the communal amenity space located to the rear building and on the roof terrace.
- 4.18 The development scheme seeks to retain and re-landscape the existing rear garden which measures at circa 323sqm. The communal roof terrace will be located on the extension to the rear of the site and will measure 55sqm. The total communal amenity space to be provided is 378sqm.

### **Access, Car and Cycle Parking**

- 4.19 The scheme proposes to accommodate nine car parking spaces on site, inclusive of one wheelchair accessible parking. The car park will be located in the forecourt to the front of the property (facing The Grove) and will provide eight parking spaces accessed via two existing driveway entrances off The Grove. Both entrances are proposed to be provided with electronically operated sliding gates to allow for safety and security of the site.
- 4.20 30 covered and secure cycle parking spaces have also been accommodated within the development. 28 of these spaces are provided by two shared cycle stores. Cycle Store 1 has the capacity for 16 bicycles, and is located within the building at the eastern side entrance. Cycle Store 2 has the capacity for 12 bicycles, and is located at the rear of the property. A further 2 private spaces are located within flat 03 (wheelchair accessible unit). For cycle store locations, please see drawing no. 1602.3/003 and no. 1602.3/005. For further information please see drawing no. 1602.3/014.

### **Boundary Treatment**

- 4.21 A new pedestrian access and gate is proposed to provide direct access to the main entrance of Dudley House. The existing low brick wall to the front

boundary will be retained in place and repaired as required. Along with new steel railings proposed to be installed above the low level wall, to allow for a 1.8m boundary to be maintained along the front boundary.

## **Refuse and Recycling**

4.22

A new bin store is proposed to be located at the forecourt, to the east side of the property boundary. This has been designed to accommodate nine bins allowing for residual waste and recycling for 17 flats. The bin store has been located within 10m of the public highway, for kerbside pick-up, with a minimum 2m wide clear access. For further information please see drawing no. 1602.3/013.

5.0

## Planning Policy Context

### Introduction

5.1

Planning law requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise. The National Planning Policy Framework (NPPF, 2012) is also a material consideration in planning decisions (paragraph 196).

### Policy Context

5.2

The Statutory Development Plan for the site comprises the latest iteration of the London Plan (2015), London Borough of Hounslow Local Plan 2015-2030 Volume 1 & Volume 2, Joint Waste Development Plan Document (DPD) (2015) and the Community Infrastructure Levy (CIL) Charging Schedule (2015). The relevant Supplementary Planning Guidance (SPG) and Supplementary Planning Documents (SPDs) are also applicable:

- Planning Obligations and CIL SPD (2015)
- Unitary Development Plan SPG (1997)

5.3

In addition, a request to designate a neighbourhood area at Osterley was submitted to LBH in April 2016. A public consultation on the proposed neighbourhood area ran between 26<sup>th</sup> April to 8 June 2016. The Council is expected to make a decision on 26<sup>th</sup> July 2016.

### National Planning Policy Framework

5.4

The NPPF (March 2012) sets out the Government's overarching objectives for the planning system to enhance and improve the places in which people live their lives, and at the heart of it is a:

*"presumption in favour of sustainable development which should be seen as a golden thread running through both plan-making and decision taking" (para 14).*

5.5

Boosting the supply of housing (para 47), delivering a wide choice of high quality homes, increasing opportunities for home ownership and creating sustainable, inclusive and mixed communities is key to the NPPF (paragraphs 49 & 50).

5.6

Good design is also a key aspect of sustainable development and should contribute positively to making places better for people (para 56) and should promote or reinforce local distinctiveness (para 50).

5.7

The NPPF also requires that consideration is given to the impacts of development on the significance (including setting) of designated and non-designated heritage assets (paras 131 - 135).

## The London Plan

5.8 The London Plan (LP) is the Mayor's spatial development strategy document. It is part of the development plan and is to be taken into account when planning decisions are taken across London. The policies below reflect the latest iteration of the London Plan, Minor Alterations to the London Plan, adopted in March 2016.

5.9 The following policies of the LP are relevant:

- Policy 3.3 (Increasing Housing Supply) recognises the pressing need to provide more homes in London and requires London Boroughs to make provisions to meet the minimum borough annual average housing target.
- Policy 3.4 (Optimising Housing Potential) seeks to optimise housing development output for different types of location.
- Policy 3.5 (Quality and Design of Housing Developments) seeks to ensure Local Planning Authorities apply minimum residential space standards.
- Policy 3.6 (Children and Young People's Play and Informal Recreation Facilities) states that development proposals that include housing should make provision for play and informal recreation.
- Policy 3.8 (Housing Choice) seeks to ensure new developments offer a range of housing choices.
- Policy 5.2 (Minimising Carbon Dioxide Emissions) seeks to ensure development proposals make the fullest contribution to minimising carbon dioxide emissions in accordance with the energy hierarchy: Be lean, Be clean, Be green.
- Policy 5.3 (Sustainable Design and Construction) requires development proposals to demonstrate that sustainable design standards have been integral to the proposal, including its construction and operation.
- Policy 5.7 (Renewable Energy) requires development proposals to provide a reduction in expected carbon dioxide emissions through the use of on-site renewable energy generation, where feasible.
- Policy 5.13 (Sustainable Drainage) ensures that sustainable urban drainage systems are utilised in developments unless there is a practical reason for not doing so.
- Policy 5.15 (Water Use and Supplies) seeks to ensure developments minimise the use of mains water.
- Policy 6.9 (Cycling) requires developments to provide accessible parking facilities in line with minimum standards.
- Policy 6.13 (Parking) requires developments to comply with maximum standards for car parking and provide spaces for electric and accessible parking.



- Policy 7.4 (Local Character) seeks to ensure that development has regard to form, function and structure of an area and the scale, mass and orientation of surrounding buildings
- Policy 7.6 (Architecture) states that architecture should incorporate the highest quality materials and design appropriate to its context
- Policy 7.8 (Heritage Assets and Archaeology) aims to maintain and enhance the contribution of heritage assets to whilst

## **London Borough of Hounslow Local Plan (2015-2030)**

5.10

The following planning policies from the LBH Local Plan are relevant to these proposals:

- 1 Policy SC1 (Housing Growth) recognises that an important contribution to housing supply that small infill sites make to housing supply and requiring the design of these to respond to and reflect local context and character.
- 2 Policy SC2 (Maximising the Provision of Affordable Housing) seeks to maximise the provision of affordable mixed tenure housing on development sites and have set a strategic target of 40% of all additional housing to be affordable.

Developments will be expected to provide an open book financial viability assessment and any supporting evidence to demonstrate the maximum provision of on-site affordable housing is being proposed on sites with a capacity for 10 or more homes, with reference to the 40% strategic affordable housing target as well as the impacts of existing floorspace through VBC and reduced CIL liability.

Affordable housing should be provided on site and should provide a mix of 60% social rented and 40% intermediate tenures.

- 3 Policy SC3 (Meeting the Need for a Mix of Housing Size and Type) seeks to meet local housing need by securing a mix of new housing type, size and tenure across the borough
- 4 Policy SC4 (Scale and Density of New Housing Development) seeks ensure the scale and density of new housing development balances the need to make efficient use of land and achieves high quality design and accessibility, whilst responding to and reflecting local context and character and protecting existing residents' amenity.
- 5 Policy SC5 (Ensuring Suitable Internal and External Space) requires developments will be required to be of the highest quality internally and externally, and meet the demands of everyday life for the intended occupants, whilst offering flexibility to meet changing needs and respect the principles of good neighbourliness.
- 6 Policy SC6 (Managing Building Conversions and Sub-division of the Existing Housing Stock) seeks to manage the conversion of buildings and the subdivision of existing housing stock so as to contribute to

housing supply without having an adverse impact of the character of an area, or residents' amenity.

- 7 Policy SC7 (Residential Extensions and Alterations) supports the extension and improvement of residential properties provided they maintain the character of the area, and do not result in harm to the amenity of neighbouring residents, existing and future occupants, and the built and natural environment.
- 8 Policy SC8 (Specialist and Supported Housing) supports the provision of appropriate housing to meet the specialist and supported needs. The policy also seeks to minimise the use of residential and nursing homes in favour of independent living.
- 9 Policy CC1 (Context and Character) recognises the varied character of the borough's places, and seek to ensure that all new development conserves and takes opportunities to enhance their special qualities and heritage.
- 10 Policy CC2 (Urban Design and Architecture) seeks to recognise the context and varied character of the borough's places, and seek to ensure that all new development conserves and takes opportunities to enhance their special qualities and heritage.
- 11 Policy CC4 (Heritage) seeks to ensure opportunities are taken to enhance the significance of the borough's heritage assets.
- 12 Policy EQ1 (Energy and Carbon Reduction) facilitates a move towards being a low carbon borough, by minimising the demand for energy and promoting renewable and low carbon technologies in all development proposals.
- 13 Policy EQ2 (Sustainable Design and Construction) promotes the highest standards of sustainable design and construction in development to mitigate and adapt to climate change.
- 14 Policy EC2 (Developing a Sustainable Local Transport Network) states that the Council will apply the London Plan standards for car and cycle parking.

5.11 The site is not subject to any specific allocations.

### **Springfield Grove Conservation Area**

5.12 The Springfield Grove Conservation Area (CA) was designated in 2001. The Character Area Appraisal for the site states the special interest of Spring Grove derives from its history as a planned estate to provide grand Victorian suburb. The Davies original estate still remains with tall classical-style villas, spacious gardens and more subtle semi-detached Arts and Crafts style houses. The classical element of the CA is characterised by the use of 'Bath-stone' as its prevailing material.

5.13 With regards to The Grove, the large houses on the outer curve of The Grove were part of the Davies development. At the turn of the 19<sup>th</sup> and 20<sup>th</sup> centuries

and in the 1920s, properties on the inner curve of The Grove were developed and are well-preserved examples of development of this period. Whilst it is recognised that there is more recent, occasionally unsympathetic infill in The Grove, often this has been on the outer curve, where the large Davies plots have been sold off for more dense development. In this respect, The Grove is coherent mix of property types and ages, which, on the whole, complement each other.

5.14

The following guiding principles have been stated in the CA:

- 1 The layout of the original Davies Estate and plot forms are essential to the character.
- 2 The earlier buildings are of special interest in form and materials.
- 3 Later 20th century infilling on the whole has been carefully planned and is in keeping.
- 4 Spatial quality and boundary treatment forms an essential element to the area.
- 5 Mature trees are part of the original design and present character.
- 6 Large dormers are likely to be obtrusive.
- 7 The gaps between buildings make up part of the character and should be considered.
- 8 Redevelopment should be of good and compatible quality and style.
- 9 Focal points and elegant buildings with a spaciousness nature are necessary to remain in character.

### **Planning Obligations and CIL SPD**

5.15

The SDP states planning obligations will be primarily used to secure the following items:

- 1 Affordable housing provision;
- 2 Job brokerage for Hounslow residents;
- 3 Construction and end-user training for Hounslow residents;
- 4 Site specific highways, transport network and public realm improvements works;
- 5 Travel Plans;
- 6 Car free agreements;
- 7 Car club spaces;
- 8 Considerate contractor schemes;
- 9 Sustainable Design: Carbon off-set projects and site specific commitments to connect to decentralised energy networks
- 10 Site specific mitigation measures such as: heritage, biodiversity, flood risk, air and noise quality, and community safety measures

- 5.16 Standard charges for planning obligations are stated within section 6 of the SPD.

### **Unitary Development Plan SPG**

- 5.17 This SPG provides the standards and controls by which the Council will assess planning applications. Once the principle of development has been established, the council will require development proposed to give due regard and achieve compliance with these standards and controls (though it is noted these are not applied prescriptively).
- 5.18 General Standard 1 (design and layout) seeks to ensure development proposals are compatible with, and make a positive contribution to, the character of the district and locality. Alongside scale, massing, siting and size, the design of facades should take into account the detailed characteristics of buildings and spaces in the locality and the established horizontal and vertical visual patterns of surrounding buildings. The standard states the amount of space around and between buildings should be safeguarded in order to minimise the visual impact, preserve outlook and prevent unreasonable loss of privacy from overlooking. The layout of development schemes should also give due regard to the existing landscape features and environment, retaining as far as possible trees and shrubs already in situ. The SPG also requires proposed car parking and servicing areas to be designed sensitively incorporating appropriate landscaping.
- 5.19 General Standard 3 (safety and security guidelines) requires refurbishment schemes to be designed to help create a safe and secure environment. All applications should therefore meet the following principles:
- 1 Ensure there is defensible space around buildings, making a clear distinction between public and private areas;
  - 2 Allow for overlooking of and safe access to open spaces around buildings;
  - 3 Restrict entry to private areas; and
  - 4 Provide clear sight lines avoiding dead ends, recesses and blind corners
- 5.20 Further guidance specific to residential dwellings is given in section 2.3 of this standard.
- 5.21 The SPG provides further details on Residential Standards and Controls, namely on form and design; private amenity space; roads, footpaths, parking and servicing; internal space provision; and housing for people with disabilities. Whilst a number of the stated residential and space standards have been replaced by updated London Plan and LBH requirements, it is considered the associated principles are still relevant to forthcoming development proposals. Of note, is the guidance on form and design (standard 9), private and communal amenity space and housing for people with disabilities.

6.0

## Planning Assessment of Proposal

6.1

The following section identifies the main planning issues and whether the development would accord with the relevant planning policies in the NPPF; the London Plan; the LBH Core Strategy; and the supplementary planning documents/guidance. The main planning issues are:

- 1 Principle of change of use;
- 2 Provision of affordable housing;
- 3 Design and heritage impacts;
- 4 Amenity Impacts, including compliance with adopted space standards and daylight and sunlight;
- 5 Parking and Servicing arrangements;
- 6 Energy and sustainability; and,
- 7 Section 106 obligations.

### Principle of Change of Use

6.2

It is largely accepted that there is an urgent need to increase housing supply in England and particularly in London. There is support for housing development at all policy levels, nationally, regionally and locally. The NPPF includes a presumption in favour of sustainable development for housing applications and encourages the effective use of brownfield land. In this respect, the reuse of the former nursing home site for housing will make efficient use of existing land (para. 17, bullet 8).

6.3

The London Plan recognises the need for housing in London and supports London's housing growth. Policy 3.3 identifies the potential to realise brownfield housing capacity. Local Plan Policy SC1 encourages increasing residential development within the borough. The site is located in a predominantly residential area which is accessible by public transport (PTAL level 3) and, as such, residential use is considered to be a suitable use for the building, allowing it to contribute to the housing supply annual monitoring target of 822 additional homes per year.

6.4

The Local Plan Policy SC8 supports provision of specialised and supported housing, though acknowledges that the Council should aim to reduce the need for specialist facilities such as nursing homes in favour of encouraging independent living. Paragraph 5.25 in the supporting text also acknowledges overprovision of private nursing and residential care in the borough. The London Plan is also supportive of rationalising the supply of social infrastructure, providing it can be demonstrated that the facilities are no longer required (Policy 3.16 and 3.17).

6.5

As stated within the London Plan, NHS facilities including NHS Property Services, Community Health Partnerships and NHS Community Health and

Hospital Trusts, are looking to make more effective use of the health estate and support strategies to reconfigure healthcare services and improve the quality of care (para. 3.94A). This will result in surplus sites being released for other purposes.

- 6.6 In the context of Dudley House, the use of the current building as a residential institution is considered inappropriate when assessed against current healthcare needs and standards. The internal arrangement of the building is outdated and does not meet the requirements needed for a residential nursing home. As such, this institution has been vacant for in excess of 2 years with no known future opportunities to use it as a care home coming forward.
- 6.7 In support of the above, the Council confirmed in their written response on 17 February 2016 following a pre-application meeting that it considered Dudley House would be an appropriate location for dwellings in principle and there was no objection to the loss of the existing use. This was reconfirmed in its second letter dated 14 June 2016.
- 6.8 The principle of residential dwellings in this location and the change of use away from the existing nursing home is, given the above assertions, considered acceptable and in accordance with the NPPF, London Plan policy 3.1 and LBH Local Plan policies SC1 and SC8.

## **Affordable Housing**

- 6.9 In accordance with LBH Core Strategy Policy SC2 (Maximising the Provision of Affordable Housing) development proposals for 10 or more residential units should provide 40% all new dwellings as affordable housing. Where developments are unable to meet this requirement, applications should be accompanied by an open book financial viability assessment and any supporting evidence to demonstrate the maximum provision of on-site affordable housing.
- 6.10 Due to issues regarding viability, the development proposals at Dudley House will not provide any affordable housing. The justification for this, in compliance with the above stated policy, can be found in the accompanying Financial Viability Assessment. Paragraph 13.4 of the Assessment confirmed that the value of the proposed scheme, with 17 private residential units, is lower than for the care home. This gulf in proposed and existing value is exacerbated by the inclusion of affordable housing.
- 6.11 Under the requirements of National Policy para 176, there is a need for the Council to give an allowance for competitive returns for a willing developer. In this instance, the applicant wishes to convert the property to a residential use, they acknowledge the increased risk given that it would result in a lower than accepted profit level given the high existing use value. They are prepared to accept this risk however in doing so, they are not able to deliver affordable housing. Further details are provided in the Financial Viability Appraisal.

## Design and Heritage

### Design

- 6.12 The NPPF places significant weight on ensuring good design is incorporated into development proposals and contains a focus on sustainable development. Good design has the capacity to make a positive contribution to places (para 56) and promote or reinforce local distinctiveness (para 50).
- 6.13 LBN design policies include policies CC1 (Context and Character) and CC2 (Urban Design and Architecture). Additional policies including SC4 (Scale and Density of New Housing Development), SC6 (Managing Building Conversions and Sub-division of the Existing Housing Stock) and SC7 (Residential Extensions and Alterations) are also applicable, particularly given their focus on maintaining the character of the area.
- 6.14 The LBH design policies seek to ensure development proposals have a positive impact on the amenity of current and future residents and respond in a meaningful and sensitive way to the site and its characteristics through considering layout, height and orientation of buildings and uses on sites. Part O of Policy CC1 also states that the Council will support contemporary architecture that responds intelligently to current and future lifestyles. Part Q of the same policy also requires development to carefully consider the external appearance of the development proposals and to use high quality, durable materials which can add character and visual richness to the street scene.
- 6.15 The development proposals at Dudley House, as described in Section 4 of this Planning Statement and on pages 3-5 of the Design, Access and Heritage Statement, incorporate the requirements of above stated policies. The proposed roof extension has been sensitively set back from the existing elevations to minimise its visual presence from The Grove and the neighbouring property at No.34. The roof extension is proposed to be clad pre-weathered zinc and will match the colour and appearance of the existing slate roof. The Council in its pre-application advice stated this as a preferred option over brick (letter dated 17 February 2016).
- 6.16 The rear extension will be constructed in red brick to match that of the existing building and will match it in height and appearance. The proposed French doors and additional balcony on the southern elevation, fronting The Grove will match those existing in terms of design (all existing windows and French doors will be replaced to meet energy and sustainability requirements).
- 6.17 The extension to the existing balcony and the new balcony at second floor, along with the additional window, will provide a symmetrical, visually aesthetic building that makes a positive contribution to the street scene and conservation area. The modern designed roof extension, vertical lightwell (fronting the Grove) and the rear extension have all been sympathetically designed in order to ensure it compliments and enhances the character and context of The Grove. With regards to the rear extension, the pre-application feedback from

the officers at LBH confirmed that subject to providing details of materials, the extension was appropriate.

- 6.18 The proposed alterations to the design of the existing building are therefore considered compliant with NPPF guidance and LBH Local Plan design policies.

## Heritage

- 6.19 The NPPF gives great weight to conserving heritage assets. Similarly, the London Plan seeks to prevent harm or loss to designated heritage assets of the highest significance and reiterates that this must be wholly exceptional (7.31B), whilst London Plan policy 7.4 (Local Character) seeks to ensure that development has regard to form, function and structure of an area and the scale, mass and orientation of surrounding buildings.
- 6.20 Local Plan Policies, CC1 (Context and Character) and CC4 (Heritage) seek to conserve and take opportunities to enhance the character of the conservation area and respect the grain, scale, form proportions and materials of the surrounding area.
- 6.21 The current proposals seek to bring back into use a vacant property by investing in the appearance and reinstatement of the building in active residential use to enhance the quality and character of the area. The proposed third floor extension will be completed in a sensitive fashion to minimise the impact on views and significantly improvement works would also take place on all elevations. The existing building is currently of a similar footprint to those on the east side of the Grove.
- 6.22 With regards to the rear extension, the council confirmed in its pre-application feedback letter dated 17 February 2016 that it considered the rear extension to be appropriate and *“would not result in any harm to the Conservation Area”*.
- 6.23 The development proposals are considered compliant with the NPPF and the policies within the London Plan and the LBH Local Plan.

## Amenity

- 6.24 During the pre-application stage of the development process, the Council expressed concerns over neighbouring and future occupier living conditions, with particular concern stated over the layout flats for the future occupiers.
- 6.25 With regards to the neighbouring properties, namely at Nos. 34 and 36, the Council confirmed in its pre-application feedback (dated 17 February 2016) that *“due to the orientation and the distances involved, it is unlikely that the extensions would appear overbearing”*. As stated in the design section above and recommended by the Council, additional windows that face towards the neighbouring properties have been kept to a minimum to avoid any loss of privacy.
- 6.26 With regards to the internal living arrangements for the future occupiers, the design proposals have evolved in order to take into account the Council's pre-



application comments regarding layout, relationship between flats and outlook. The Design Evolution section of the Design, Access and Heritage Statement (page 033) clearly sets out the process taken in arriving at the final submitted application proposals. For example, following LBH comments regarding the single aspect nature of a number of flats, windows were added to flat nos. 2, 10 and 15 and are now dual aspect units. In addition, the internal arrangements of flats 10 and 15 have been reconfigured to improve the outlook from the living/dining/kitchen area.

- 6.27 The development proposals are considered to be compliant with policy SC5 of the LBH Local Plan and the guidelines within the Unitary Development Plan SPG.

### Space Standards

- 6.28 London Plan policy 3.5 (Quality and Design of Housing Developments) requires housing developments to meet minimum residential space standards. These were updated in March 2016 in order to reflect the Nationally Described Space Standards and include:

Number of bedrooms	Number of bed spaces	Minimum GIA (m <sup>2</sup> )			Built-in storage (m <sup>2</sup> )
		1 storey dwellings	2 storey dwellings	3 storey dwellings	
1b	1p	39 (37)*			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	

**Source: Housing Standards Minor Alterations To The London Plan (March 2016)**

- 6.29 LBH Local Plan policy SC5 (Ensuring Suitable Internal and External Space) also requires residential developments to be highest quality internally and externally, and meet the demands of everyday life for the intended occupants. The policy applies the Nationally Described Space Standards (see above) for minimum internal space standards and requires the delivery of a minimum of 10% of new dwellings to be enhanced accessible units or adaptable units.
- 6.30 Of the units to be provided at Dudley House, all meet the stated minimum space standards. The proposals also include one accessible unit (unit 03), meeting the requirements of policy SC5.
- 6.31 Policy SC5 also requires development proposals to meet the private external amenity space as given in figure SC5.2 and includes:
- A minimum of 5sqm of private outdoor space should be provided for each 1-2 person dwelling and an extra 1sqm should be provided for each additional occupant of that dwelling;
  - Communal external space should be provided at no less than the following standards for each flat: up to 3 habitable rooms 25sqm / 4 habitable rooms 30sqm / 5 habitable rooms 40sqm.

- 6.32 The development proposals will provide 378sqm of communal amenity space (323sqm in rear garden and 55sqm on roof terrace). Four flats (nos. 09, 14, 16 and 17) will have access to a private terrace of at least 10sqm (per flat). Flats 8 and 13 will also have access to a private terrace, though it is noted these do not meet the minimum space standards.
- 6.33 The pre-application feedback letter from LBH (dated 14 June 2016) confirmed that following changes to the proposed scheme in terms of amenity space, *“appropriate levels of communal amenity space would be provided as part of the development”*.
- 6.34 The development proposal are, therefore, considered compliant with policy 3.5 of the Local Plan and Policy SC5 of the LBH Local Plan and addresses the concerns raised in the Council’s pre-application feedback (dated 17 February) regarding acceptable future living conditions.

## Daylight and Sunlight

- 6.35 In support of the development proposals, a daylight and sunlight assessment was carried out at Dudley House in order to confirm that daylight levels inside the proposed flats meet minimum standards and that sunlight to neighbouring properties is not detrimentally impacted.
- 6.36 The results from the daylight analysis confirmed that the proposed design is in compliance with the relevant minimum ADF, BS 8206-2008 Part 2 Code of Practice for Daylighting performance standards. All the assessed spaces resulted in average daylight factor values above the minimum thresholds and hence they provide satisfactory internal daylight levels to their occupants.
- 6.37 The results of the Sunlight Analysis confirm that the development has been carefully designed to ensure that there are no impacts to the neighbouring properties. The adjacent buildings were found not to be overshadowed by the development, since the exposure of their external surfaces to sunlight remained unchanged pre and post refurbishment. The sunlight levels at the assessed buildings were found to be compliant with the requirements of the BRE Guidelines.

## Parking and Servicing

- 6.38 Policy EC2 (Developing a Sustainable Local Transport Network) of the LBH Local Plan applies the standards within the relevant policies of the London Plan for car and cycle parking. The London Plan parking standards were included in the minor alternations to the London Plan published in March 2016, though it is noted the maximum parking standards have not been altered. These are as follows:

Maximum residential parking standards			
number of beds	4 or more	3	1-2
parking spaces	up to 2 per unit	up to 1.5 per unit	less than 1 per unit

- 6.39 The 14 June 2016 pre-application letter from LBH considered the amount of parking proposed (9 spaces, including 1 wheelchair accessible space), was acceptable. Further to off street parking, it is proposed that 8 on-street parking spaces (i.e. resident parking permits) should be available to those residential units who do not have a dedicated off-street space. As part of the Transport Assessment, a parking survey has been conducted and confirmed that the 8 on-street parking permits would not result in 'parking stress' and is therefore compliant with policy EC2 of the LBH Local Plan.
- 6.40 With regards to cycle parking, the proposed scheme will provide 30 spaces within three ground floor secure cycle stores. This provision meets the minimum cycle parking standards within the London Plan (table 6.3 cycle parking minimum standards).

### **Access**

- 6.41 Access to the site would be from the two retained crossovers, at the northwest and southwest boundary of the site, off of The Grove. This arrangement will provide appropriate access to the car parking spaces in the forecourt, the refuse and recycling stores and the single accessible parking space to the rear of the property (this is accessed by a shared driveway with neighbouring property no. 34).
- 6.42 A new pedestrian access is also proposed off The Grove.

### **Servicing**

- 6.43 The refuse and recycle storage bins are located within the forecourt of Dudley House and are with the require 10m of the collection point.

## **Energy and Sustainability**

### **Energy**

- 6.44 As stipulated in policy 5.2 (Minimising Carbon Dioxide Emissions) of the London Plan, development proposals are required to ensure carbon dioxide emissions are kept to a minimum and are designed in accordance with the energy hierarchy: Be lean, Be clean, Be green. In addition, the London Plan policy 5.7 (Renewable Energy) requires development proposals to provide a reduction in expected carbon dioxide emissions through the use of on-site renewable energy generation, where feasible.
- 6.45 Both of these policies have been replicated at a local level by LBH and are contained within policy EQ1 (Energy and Carbon Reduction). This policy states all development proposals should meet the carbon emission reduction requirements set out in the London Plan.
- 6.46 The accompanying Energy Statement submitted with this application outlines the energy strategy assessed and adopted as part of these development proposals:

### **Energy Hierarchy (Be Lean/Be Clean/Be Green)**

- 6.47 “Be Lean” - The following energy efficiency measures are proposed:
- 1 Low U-values and air permeability rates for the building fabric.
  - 2 Thermal, time and zone controls.
  - 3 Low energy lighting
  - 4 Use low water use fittings- This reduces the amount of hot water consumed and hence the energy used to produce hot water.
  - 5 The use of the above measures results in a saving of 13.3% (2.64 tonnes of CO2 per annum) over Part L1B 2013 emissions.

### **“Be Clean” Low Carbon Technology**

- 6.48 According to the London Heat Map, there are no existing district heating networks in the local area. However, the provision of the future connection of the Development with a district heating network has been included in the design, in accordance with the Hounslow Planning Policy EQ1.

### **“Be Green” Zero Carbon technology**

- 6.49 The installation of photovoltaic panels (PVs) at the main roof of the building is proposed in conjunction with the aforementioned energy efficiency measures.
- 6.50 As a result of the proposed concept design strategy the site’s total CO2 emissions will be 12.86 tonnes of CO2 per annum and an overall 35.47% improvement is achieved over the Building Regulations 2013 baseline. The proposed development is therefore in compliance with London and Hounslow adopted planning policy.

## **Sustainability**

- 6.51 London Plan and LBH Local Plan both contain policies which require development proposals to incorporate sustainable standards into its design (see policy 5.3 of the London Plan and EQ2 of the LBH Local Plan). These sustainable design standards should be integral to the proposals during both the construction and operation.
- 6.52 A Sustainability Statement accompanies this planning application and confirms the proposed development, when compared against the BREEAM Domestic Refurbishment 2014 Scheme, achieved a score of 75.01% which corresponds to the BREEAM ‘Excellent’ rating.
- 6.53 The proposals are, therefore, considered to be compliant with London Plan and LBH sustainability policies.

## **Community Infrastructure Levy and S106**

- 6.54 The Mayor of London has already set a CIL charge for the Greater London area, with charging commencing in April 2012. The LBH has been set a Mayoral CIL rate of £35 per m<sup>2</sup> for chargeable development.
- 6.55 Hounslow adopted its own CIL Charging Schedule in July 2015. Dudley House is located within the 'Central Area' Zone 2 and is set £110 per sqm rate for residential development.
- 6.56 In term of S106 payments, paragraph 5.15 of this planning statement sets out the areas in which the Council could request a planning obligation/contribution. Of those listed, the following are considered relevant to this application:
- 1 Travel Plans;
  - 2 Considerate contractor scheme;
- 6.57 We welcome future discussion with the Council on this matter.

## Conclusions

7.0

7.1

This planning application has been submitted in respect of the proposals for the change of use to residential dwellings of Dudley House, The Grove to provide 17 residential units in the form of 9 x 1 bedroom, 6 x 2 bedroom and 2 x 3 bedroom flats.

7.2

The proposed development will respect the character and appearance of the surrounding houses within the Conservation area in terms of scale form, massing and materials. The scheme proposed significant architectural improvements that will preserve and enhance the character and appearance of the Springfield Grove Conservation Area.

7.3

The proposals comply with the intent of the NPPF, London Plan and London Borough of Hounslow planning policies. They represent an improvement to the sustainability and architecture of the existing property and enhance the Conservation Area whilst minimising the impacts on the surrounding area. The proposal will also bring back into use a site which has been vacant since 2012 delivering a range of residential dwellings to assist the London Borough of Hounslow meet its objectively assessed housing needs.



















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