PLANNING COMMITTEE

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References: P/2015/5418 00083/ZA/P1

Address: The Lawns Car Park, 5-27 Bath Road, Hounslow

Proposal: Erection of New Civic Centre incorporating office accommodation and associated civic facilities, public library and registrar, associated car parking facilities, access and public realm and footway improvements

Ward: Hounslow West

1.0 SUMMARY

1.1 The Council are seeking to redevelop the site to provide a new Civic Centre within Hounslow Town Centre in order to facilitate the release of the current site on Lampton Road to deliver much needed housing, including a substantial provision of affordable housing on that site. This full planning application has been submitted in conjunction with a separate hybrid application for the redevelopment of the Lampton Road site to provide up to 940 new dwellings.

1.2 This proposal is for the re-development of the surface car park on the corner of Bath Road and Lampton Road, at the western end of Hounslow Town Centre to provide a new Civic Centre for LBH. This will include relocating the public library from the Treaty Centre alongside provision of a café, Council office space and Civic Chamber space, with parking provided within a basement. The new Civic Centre would be arranged over seven storeys and provide a total of 15,828m² GIA including the basement.

1.3 The scheme is considered to be of a high design quality that would be well suited to the site and surroundings and would provide a new landmark building for the Council's civic functions. It’s location within Hounslow Town Centre would assist with the on-going regeneration of the town centre and is considered to be a use that is very much suited to this highly sustainable location with excellent linkages to public transport. The proposals would give rise to limited amenity and transport issues, with the significant benefits of the scheme outweighing any perceived harm.

1.4 The application is recommended for approval subject to conditions.
2.0 SITE DESCRIPTION

2.1 The subject site, which comprises approximately 0.407 hectares in size, is located within Hounslow Town Centre as designated in the Local Plan. It is bordered by Bath Road to south and by Lampton Road to the east. To the west of the site is a Gospel Hall (one storey) and commercial buildings (two storeys) with ancillary car parking. To the north of the site there are large commercial buildings (four storeys) with ancillary parking to the rear.

2.2 The site is currently used as a surface car park with space for 120 cars and is owned and managed by the Council. There is a public WC facility and bus stand on the southern edge of the site.

2.3 The primary vehicular access is in the south-east corner of the site from Bath Road, with a secondary access point to the north from Bulstrode Road, although this is currently gated off. It has a Public Transport Accessibility Level of 6a (Excellent), is less than 300m from London Underground’s Hounslow Central station and within two Controlled Parking Zones.

2.4 The Council’s Local Plan (adopted September 2015) allocates the Bath Road Site (under Site Reference 34) for a mixed use development to include; Civic use, offices and potential for some residential. The London Strategic Housing Land Availability Assessment (2013) and Hounslow Town Centre Masterplan (2013) also identified the site for redevelopment.

2.5 The site is not within a Conservation Area however it does lie within an Archaeological Priority Area. The nearest statutory listed building is Tudor House, approximately 35m away to the south-east, while there are a number of locally listed building to the south-west; namely Yates Public House, Neals Corner and The Bell Public House.
3.0 HISTORY

3.1 LBH Cabinet members gave approval on the 17th November 2015 to enter into a Development Agreement with BY Development Ltd to develop a new Civic building at the Bath Road Car Park site and to sell the land at Lampton Road (existing Civic Centre site) in 2 phases for housing development (REG278).

4.0 DETAILS

4.1 The application proposes the redevelopment of site to provide a new seven-storey building for B1(a) use, associated civic facilities and a public library and registrar, with basement car parking. A service yard to the north of the site would contain a single-storey building for cycle parking with space for 112 bicycles (106 standard and 6 folding), a single-storey refuse storage building and a two-storey plant store.

4.2 The main building would have a gross internal floor area of 15,828m² over six floors, plus a basement with the seventh floor containing a plant room. The basement level would accommodate car parking, changing rooms and plant rooms. The ground floor would contain the public entrance with customer services, back office rooms and a sandwich bar/cafe. The first floor would contain a library, registrar and adult learning space. Civic office space would cover the second to fifth floors and include work stations for over 800 employees, with the sixth floor accommodating roof terraces, the Council chamber, staff lounge, Mayor’s office and Members’ lounges. A 195m² plant room and photovoltaic panels would sit atop the sixth floor.

4.3 The proposed material palette would consist of anodised aluminium cladding and glazing. The anodising aluminium would have a matt finish to limit any solar glare particularly to road users and pedestrians.
4.4 Vehicular access to the basement would be from the south of the site via a barrier operated ramp. The car park would contain 43 car parking spaces of which 12 would be disabled accessible spaces. There would be two additional spaces for vans (for loading). Secondary vehicle access to the servicing yard would be from Bulstrode Road to the north.

4.5 The main pedestrian access point for visitors would be on the Bath Road frontage on the building’s south-east elevation. A secondary access point to the site for staff would be from the service yard on the north-west elevation. Staff would be able to access this entrance from Bulstrode Road in the north or by walkways running around the north and west sides of the building.

4.6 The proposal includes a toucan (pedestrian and cycle) crossing from the High Street to the south-east side of the site, the reconfiguration of the existing cycle route along this side of Bath Road and the relocation of the existing bus stand to Steve Biko Way and public WC to Staines Road.
4.7 The public realm between the building and Bath Road to the south and Lampton Road to the east would be paved. Areas of soft landscaping – consisting of trees, shrubs, and hedging – would be situated in the west and north-east edges of the sites. The north-east corner of the site would also contain 46 visitor cycle spaces.

5.0 CONSULTATIONS

5.1 508 neighbour notification letters were sent on the 17/12/2015, including to the Hounslow Central Residents’ Association, St Stephen’s Residents’ Association (Hounslow), and Hounslow Pensioners Forum. Two site notices were displayed on the 22/12/2015 and a press notice was published on the 18/12/2015. Two objections have been received which have been summarised as follows:

<table>
<thead>
<tr>
<th>Comment</th>
<th>Response</th>
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<tbody>
<tr>
<td>Lack of children/family toilets in or near the library</td>
<td>Male and Female Superloo toilets are available for public use, direct from the library area without the need to pass the security control doors. Also provided is a unisex self-contained wheelchair accessible toilet cubicle and a baby change facility compliant with BS 8300:2009+A1:2010.</td>
</tr>
<tr>
<td>Insufficient public lift capacity for large attendances in top floor</td>
<td>The two public lifts together with a single staff lift, will be accessible during functions. These lifts will be switched to express mode (by security staff) to enable them to quickly transfer the public between ground and sixth floor.</td>
</tr>
<tr>
<td>No provision for the local studies unit and archives in the library</td>
<td>Local studies and archive is not part of the lending library moving to the new Civic. The borough’s Leisure and Culture Strategy 2016-2020, was discussed at a Council meeting on the 26th January 2016. A copy of the Officers’ report (ref REG 368) recommending acceptance of the strategy, the related draft strategy along with the minutes of the meeting is available on the Council’s web site.</td>
</tr>
<tr>
<td>Lack of appropriate space for large meetings</td>
<td>The maximum number of 300 people attending council meetings within the Civic Chamber was a</td>
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requirement stated within the Council’s client brief which set out the Council’s needs and requirements for the new building. Larger meetings will be held at an alternative venue.

<table>
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<tr>
<th>Requirement</th>
<th>Description</th>
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<tr>
<td>Loss of outlook</td>
<td>The proposed building is a substantial distance from the nearest residential properties and is of a scale and massing that is sympathetic to the surrounding townscape, taking into consideration its location within Hounslow Town Centre. See paragraphs 7.56-7.57.</td>
</tr>
<tr>
<td>Overshadowing</td>
<td>The proposed building is a substantial distance from the nearest residential properties, which are located to the north-west and west, with other, non-residential buildings situated between. See paragraphs 7.51-7.52.</td>
</tr>
<tr>
<td>Loss of car park</td>
<td>The site is located in a highly accessible location for public transport with one of the main aims of new developments to reduce the use of private cars. Other town centre public car parks are located close to the site (e.g. Montague Road/Treaty Centre). See paragraphs 7.90-7.91.</td>
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5.2 **Hounslow Central Residents’ Association** have made the following comment:

- “For the most part these applications are outside the terms of reference of the HCRA, though we are very interested in how the excess parking demand created by the loss of the Bath Road and other car parks will be accommodated.”

5.3 **Heathrow Airport** has no objection to the proposal but remind the applicant of the need to consult nearby aerodromes if cranes are to be used. An informative is attached to this affect.

5.4 **Greater London Authority (GLA):** Whilst the scheme is broadly supported in strategic planning terms, the application does not yet fully comply with the London Plan, as set out below:
• Principle of development: GLA officers strongly support the proposed development of this prominent yet under used town centre site for civic accommodation and related uses. It is further noted that the delivery of this scheme would release Hounslow’s existing civic centre site at Lampton Road for residential-led redevelopment in support of London Plan Policy 3.3 and strategic objectives for the Hounslow Housing Zone.

• Social infrastructure: Through intelligent design and inherent space efficiencies, the proposal would ensure that existing civic functions at Lampton Road could be maintained at this compact and sustainable town centre site. Furthermore, noting the proposed multiple use of the facility for civic and community uses, and the benefits of releasing the Lampton Road civic centre site for residential-led redevelopment, GLA officers strongly support the proposal in accordance with London Plan Policy 3.16.

• Urban design: The layout of the proposal is well considered, and the proposed infilling of this underused site with a well-designed and well-activated building (with high quality public realm) would significantly enhance the character of the town centre in townscape terms. GLA officers support the design of the scheme which would become a new civic landmark in Hounslow town centre. Accordingly the application complies with London Plan Policy 7.1.

• Inclusive access: The approach to access and inclusion is broadly supported in accordance with London Plan Policy 7.2. The Council is, nevertheless, encouraged to secure detailed approval of landscaping matters by way of planning condition.

• Sustainable development: The proposed carbon dioxide savings and climate change adaptation measures are broadly supported in strategic planning terms. Following the conclusion of discussions on the energy strategy, the Council is encouraged to secure associated energy and adaptation details by way of planning condition in accordance with London Plan policies 5.2, 5.10, 5.11, 5.13 and 7.19.

• Transport: Whilst the application is generally acceptable in strategic transport terms, the applicant should address the matters raised with respect to: site access; trip generation and impact assessment; car parking; cycling; walking; travel planning; delivery and servicing plan; and, construction logistics plan to ensure accordance with London Plan policies 6.3, 6.9, 6.10, 6.13 and 6.14.

5.5 Historic England: No further archaeological assessment or conditions are necessary.

5.6 Transport for London (TfL) has provided the following initial comments:

• Trip generation: The selected surveys from the TRICS database are acceptable to TfL.

• Highway assessment: The results of the capacity assessment indicate that there will be a positive impact on traffic flows because vehicle trips
associated with the site are anticipated to decrease as a result of the proposed development.

- It is recommended that a further test is carried out based on the higher car mode share in the staff survey data.

- The site access modelling indicates that there should be a positive impact on capacity and queuing at the junction. It may be necessary to carry out additional assessment beyond the site access junction based on the higher car mode share in the staff survey.

- Public transport impact: Although a highways capacity assessment has been carried out, there has been no equivalent for public transport despite the increase in public transport trips anticipated as a result of the development. A net impact for all forms of public transport trips should be carried out. Once the net trip generation split by mode and direction has been provided, TfL will be able to confirm whether any public transport capacity mitigation will be required.

- Bus infrastructure: No objection in principle to the relocation of the bus stop to Steve Biko Way however the detailed design will have to be agreed with TfL prior to commencement.

- Access: It is important that the detailed design of the access takes into account the potential for conflicts between turning vehicles and other road users including buses and cyclists.

- The marked route for cyclists through the servicing area will need to be supervised by building management staff.

- Car parking: Parking provision in accordance with London Plan standards and is supported by TfL. However TfL requires confirmation that staff will not be given access to other town centre car parks or permit parking when they move from the Lampton Road to Bath Road site.

- The Travel Plan will need to far more ambitious and a programme to dramatically alter travel behaviour will need to be put in place. Alternatively TfL may require further modelling to establish what impact there would be on highway capacity if mode split assumptions derived from the staff travel survey were used.

- A car park management plan (CPMP) will need to be prepared and secured as part of any permission. TfL is pleased to note that the proportion of Blue Badge parking and the number of electric vehicle charging points will be in excess of minimum standards.

- Cycling: The proposals for cycle parking are welcomed.

- Pedestrians: The PERS style audit of the pedestrian environment is welcome but the TA and Travel Plan will need to set out proposed mitigation to remedy the identified deficiencies.
- **Travel planning**: A series of measures will need to be put in place with immediate effect to ensure that by the time of relocation in 2018 car use is consistent with the proposed low level of on-site parking at Bath Road.

- **Delivery and Servicing Plan**: The servicing and delivery arrangements are welcomed by TfL but they will have to be carefully managed. A Delivery and Servicing Plan should be secured by condition.

- **Construction Logistics Plan**: A finalised CLP will need to be secured by condition.

5.7 Since the proposal is for a major development on Council Owned Land, the application has been drawn to Members' attention on the weekly pending decision list dated 15th – 22nd January (Week 2).

5.8 The application will be referred back to the GLA (Stage 2) once a resolution has been made by Members. Under the Town & Country Planning (Mayor of London) Order 2008 the Mayor, upon re-consultation by the local planning authority, may direct the Council to refuse the application or issue a direction that he is to act at the local planning authority for the purpose of determining the application.

6.0 **POLICY**

**Determining applications for full or outline planning permission**

6.1 The determination must be made in accordance with the development plan unless material considerations indicate otherwise. Local finance considerations must also be assessed.

**The National Planning Policy Framework**

6.2 The National Planning Policy Framework (NPPF) came into force on 27 March 2012, and from April 2014 National Planning Practice Guidance (NPPG) in the form of an online guidance resource to support the NPPF came into effect. The Local Planning Authority (LPA) considers that, where pertinent, the NPPF and NPPG are material considerations and as such, will be taken into account in decision-making as appropriate.

**The Development Plan**


6.4 The Local Plan documents can be viewed on the Planning Policy pages of the Hounslow website.

7.0 **ASSESSMENT**

**The principle of the proposed civic development**

7.1 The National Planning Policy Framework (NPPF) states that new applications should be considered in the context of the presumption in
favour of sustainable development. It goes on to state (Paragraph 111) that planning policies and decisions should encourage effective use of land by re-using previously developed (brownfield) land, provided it is not of high environmental value.

7.2 London Plan Policy 2.15 (Town Centres) states that development proposals in town centres should “sustain and enhance the vitality and viability of the centre” and should “support and enhance the competitiveness, quality and diversity of town centre retail, leisure, arts and cultural, other consumer services and public services”.

7.3 The London Plan supports the redevelopment of, and increase in office floorspace to help improve London’s competitiveness under Policy 4.2 (Offices).

7.4 Hounslow’s Local Plan, which was adopted on 15th September 2015, commits that “The high street will recapture its civic role with the relocation of Hounslow Council offices which will help strengthen it as a place to do business, network, meet friends, shop and live, supported by a transformed public realm and new cultural and leisure attractions.”

7.5 The adopted Local Plan sets out the Borough’s approach to Sustainable Development and how it will be achieved (IMP1 – Sustainable Development), and includes:

IMP2 (Delivering Site Allocations): We will ensure that site allocations contribute to the delivery of sustainable growth and supporting infrastructure, which will be achieved by:

a. Supporting in principle the proposals that accord with the identified site allocation and the proposed use of the site and which have regard to the context constraints and other provisions of the respective site allocations;

b. Preparing non-statutory planning briefs, masterplans and promoting housing zone designations where appropriate to support the development of individual site allocations and the spatial integration of related development sites; and

c. Considering the use of Compulsory Purchase Orders to support wider regeneration objectives and the delivery of critical or necessary infrastructure.

IMP3 (Implementing and Monitoring the Local Plan): We will implement the Local Plan, working with strategic partners and the local community and committing to monitoring the progress made year by year. We will ensure that new development in the Borough contributes towards the provision of infrastructure needed to support growth.

7.6 Local Plan Policy ED1 ‘Promoting Employment Growth and Development’ states that the Council will promote new office based employment. They will achieve this by directing new offices to the borough four town centres and to allocated sites. Town centres offer high level of public transport accessibility which helps to cater for high trip generating offices uses.
7.7 Policy TC2 (Ensuring the future vitality of town centres) of the Local Plan expects development proposals to contribute to the regeneration of the respective town centre, consistent with the spatial strategy and policies set out in the Local Plan, and guidance developed to improve the performance of centres, including the Hounslow Town Centre Masterplan.

7.8 In the adopted Local Plan, the application site is allocated (Site Reference 34) for ‘Mixed Use’ with Civic use, offices and potential for some residential the identified uses appropriate for the site. The mixed use allocation is based on a floorspace ratio of 75:25 civic/office uses to residential. The site was identified as a proposal site through the Hounslow Town Centre Masterplan and through the London SHLAA 2013 as it has a potential housing capacity during the plan period. The site assessment recognises constraints to potential development of the site, namely its location within an Archaeological Priority Area and the consideration of the need to retain or re-provide town centre car parking on this site.

7.9 The Hounslow Town Centre Masterplan was published by the London Borough of Hounslow’s Cabinet on 3rd December 2013, and sets a framework for future development in the town centre, based on a vision to 2021 and a comprehensive set of development principles for key development opportunity sites, spaces and streets. The Masterplan supports the delivery of the objectives contained within Local Plan policy TC2. The site is identified as Opportunity Site 11 (Bath Road Car Park) within the Masterplan. It outlines Core Design Principles and Development Principles relating to matters such as uses, scale and form, public realm, and movement, whilst also identifying key constraints.

7.10 The Masterplan identifies the site as being able to deliver a high quality civic facility, or commercial and residential development if found not to be feasible.

7.11 A Planning Brief was prepared for the Bath Road Car Park site in December 2014 and approved by Planning Committee on 26th of February 2015. Although not statutory planning documents, Planning Briefs can be prepared by the Council to provide greater clarity on the required outcomes of a development site in order to secure planning permission and can be a material consideration when assessing any application for the site.

7.12 The site is currently a public car park which would be lost as a result of the proposal. While the allocation in the adopted Local Plan highlights the potential need to retain or re-provide town centre car parking on this site, it has been demonstrated that sufficient capacity remains in Hounslow Town Centre to negate the need for its retention or re-provision (discussed in more detail in paragraphs 7.90-7.91).

7.13 With the site currently being underutilised and identified as being highly appropriate for intensification, being a large brownfield site in the town centre, it is considered that the principle of its redevelopment would be acceptable and provide significant benefits for the local area.

7.14 The reintroduction of the Civic Centre to Hounslow Town Centre would provide a boost to the regeneration of the town centre through greater
footfall of staff and residents, would bring to an end the isolation of the Civic Centre from the commercial centre of the town, and would create a strong community space by combining the library and registrar service within the new Civic building.

7.15 The Site Allocation and the Planning Brief indicate that housing could be included on the site. However, due to the operational requirements of the Civic Centre building and the site constraints, the provision of housing on the site was found not to be possible as part of this proposal. The relocation of the Civic Centre to the Bath Road Car Park site would allow for the redevelopment of the Lampton Road site as a residential development with provision for up to 940 new dwellings. Therefore, although the subject site would not, in itself, deliver any housing it would help facilitate the delivery of a significant provision close to the Town Centre and in a more appropriate location.

7.16 It is therefore considered that the proposal is in accordance with adopted policies; it would re-use a brownfield site, providing an appropriate mix of uses for this town centre site that would contribute towards the improvement of the vitality and viability of the town centre, as well as facilitating the provision of high quality accommodation on the existing Civic Centre site that would help deliver much needed housing for the Borough. This would accord with the objectives of the NPPF, the London Plan and adopted Local Plan policies, noting in particular the site allocations and the aspirations for the development of this site. The proposal would therefore be acceptable in principle, notwithstanding the other planning issues that will be discussed in turn.

7.17 The other main planning issues to consider are:

- Urban Design;
- The impact on neighbouring land uses;
- Highways, Transport and Access;
- Energy and Sustainability; and
- Other environmental considerations

**Urban Design**

**Context**

7.18 The NPPF states that good quality design is an integral part of sustainable development and that decision takers should always seek high quality design. It states that achieving good design is about creating places, buildings or spaces that work well for everyone, look good, will last well, and adapt to the needs of future generations, with good design responding in a practical and creative way to both the function and identity of a place, putting land, water, drainage, energy, community, economic, infrastructure and other such resources to the best possible use. The NPPF also says permission should be refused for development of poor design that fails to
take the opportunities available for improving the character and quality of an area and the way it functions. It is proper to seek to promote or reinforce local distinctiveness.

7.19 However it makes clear that planning permission should not be refused for buildings and infrastructure that promote high levels of sustainability because of concern about incompatibility with an existing townscape, if mitigated by good design (unless the concern relates to a designated heritage asset and the impact would cause material harm to the asset or its setting which is not outweighed by the proposal’s economic, social and environmental benefits).

7.20 The degree to which new development reflects and responds to the character and history of its surrounds is a key element of good design as defined within the NPPF. This relationship should be considered throughout the design process, and should inform the positioning, massing, height, and materiality of development proposals. Developing a design solution that works with its surrounding context should not prevent or discourage appropriate innovation.

7.21 The London Plan requires all large scale proposals to be of the highest quality design especially in terms of impact on views, the wider and local townscape context and local environmental impact. The achievement of high quality urban design is also highlighted as a key factor in achieving a more attractive and green city.

7.22 London Plan Policy 7.4 (Local Character) sets out that buildings should provide a high quality design response to the urban grain, street pattern, natural features, human scale and the historic environment and is supported by Policy 7.6 (Architecture) which seeks to promote high architectural and design quality appropriate to its context.

7.23 Policy 7.7 of the London Plan (Location and Design of Tall and Large Buildings) does not explicitly define such buildings in the policy, nor is there specific definition in the CABE Guidance on Tall Buildings on which the policy draws, but given the height of the proposal it may be argued that it would constitute a tall building.

7.24 The policy does not seek to resist tall and large buildings in appropriate locations and notes that their location should be part of a plan-led approach with boroughs working with the Mayor to consider which areas are appropriate for such buildings and identify them through local policy. The following criteria are listed within the policy:

a. “generally be limited to sites in the Central Activity Zone, opportunity areas, areas of intensification or town centres that have good access to public transport;

b. only be considered in areas whose character would not be affected adversely by the scale, mass and bulk of a tall or large building;

c. relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm (including
landscape features), particularly at street level;

d. individually or as a group, improve the legibility of an area, by
emphasising a point of civic or visual significance where appropriate,
and enhance the skyline and image of London;

e. incorporate the highest standards of architecture and materials,
including sustainable design and construction practices;

f. have ground floor activities that provide a positive relationship to the
surrounding streets;

g. contribute to improving the permeability of the site and wider areas,
where possible;

h. incorporate publicly accessible areas on the upper floors, where
appropriate;

i. make a significant contribution to local regeneration.”

7.25 Adopted Local Plan Policy CC1 (Context and Character) states that
development proposals should have due regard to the Context and
Character Study and Policy CC2 (Urban Design and architecture) states
that “We will retain, promote and support high quality urban design and
architecture to create, attractive, distinctive, and liveable places”.

7.26 The Urban Context and Character Study identifies and analyses the urban
classification of the Borough. By assessing the character of those areas of the
Borough likely to undergo significant growth over the Local Plan period, the
Context and Character Study can help new development to add to local
classification in ways which enhance positive qualities and address negative
issues. Within the Context and Character Study, the site is broadly
described as being:

- ‘Medium’ Design Quality
- ‘High’ Sensitivity to Change
- ‘Low’ Permanence
- ‘Some’ Suitability for tall buildings

7.27 The Urban Context and Character Study defines a tall building in the
borough as any building or structure which is over 20m in height and/or
which is significantly taller than the surrounding townscape and/or which
recognisably changes the skyline. As the height of the proposed building is
31m it would constitute a tall building in terms of the Study and Local Plan.

7.28 Local Plan Policy CC3 (Tall Buildings) outlines the Council’s approach to
tall buildings:

“To contribute to regeneration and growth, we will support high quality tall
buildings in identified locations which accord with the principles of
sustainable development.”
It goes on to state that tall buildings will be supported in Hounslow town centre and lists 12 criteria against which the Council would expect proposals for tall buildings to comply. These are:

a. “Be sensitively located and be of a height and scale that is in proportion to its location and setting, and carefully relate and respond to the character of the surrounding area;

b. Be of the highest architectural design and standards; be attractive, robust and sustainable;

c. Be of a scale that reflects their relevance and hierarchical importance when located within a grouping/cluster of tall buildings;

d. Be designed to give full consideration to its form, massing and silhouette including any cumulative impacts and the potential impact of this on the immediate and wider context;

e. Relate heights to widths of spaces to achieve comfortable proportions, and provide a positive edge to the public realm and a human scale through the careful treatment of ground floors and lower levels;

f. Provide for a comfortable and pleasant microclimate which minimises wind vortices and over-shadowing;

g. Provide for biodiversity within the building form and be sensitive to surrounding open spaces including waterways to ensure minimal impact;

h. Take opportunities to enhance the setting of surrounding heritage assets, the overall skyline and views;

i. Carefully consider the façade and overall detailing to ensure visual interest, vertical and horizontal rhythms, an indication of how the building is inhabited, internal thermal comfort and the visual break-up of the building visually at varying scales;

j. Use materials and finishes that are robust, durable and of the highest quality, with facades providing innate interest, variety and function;

k. Incorporate innovative approaches to providing high quality, usable, private and communal amenity space where residential uses are proposed; and

l. Comply with the requirements of the Public Safety Zone for London Heathrow Airport, where appropriate.”

The supporting text of Policy CC3 states that, “Way-marking can come from distinctiveness rather than size, so tall buildings should be placed in suitable locations where access to public transport is good and they provide a relevant marker and focal point”. It goes on to state that “Located in the right place and designed sensitively, tall buildings can add to an area’s townscape and image, assist in regeneration, mark a town centre/public
transport node or assist in way-finding”.

Scale, massing, and layout

7.31 The Hounslow Town Centre Masterplan 2013 states that the site is suitable for a taller element or marker to ensure the site is visible from the High Street and stations, and to guide pedestrian movement along Lampton Road. It goes on to suggest a scale of from 3-5 storeys, with taller components providing townscape interest and the scale should step down to the western edge to respect the setting of lower rise buildings.

7.32 The Planning Brief for the site considered the potential scale appropriate for the site in more detail. It found that, due to the varying character around the Bath Road Car Park site, a new Civic Centre building could occupy 5-8 storeys and that the building should be visible within the townscape of Hounslow Town Centre, whilst avoiding any over-bearing of neighbouring buildings.

7.33 The footprint of the main building appears triangular with its corners chamfered to address the main approach from Bath Road and Lampton Road and to reduce the massing by stepping back from adjoining owners, as sought by the Planning Brief. Setting the building away from the site’s boundaries improves the public realm while also introducing an appropriate separation to the smaller scale buildings directly to the north and west.

7.34 The scale of the proposed building would serve as a visual marker; signalling the start of the Town Centre when approaching from the west and as an aid to way-finding for people approaching from both stations and the High Street. The scale and prominence would also identify it as a building of importance – as its civic function would attest – thereby enhancing the legibility of the Town Centre.

Exploded view to show how the building has been broken down in response to its context.

7.35 The cutting back of the northern and southern corners at the seventh storey
would reduce the apparent bulk of the building while providing external terraces for use during civic functions and for general staff use. These recesses would also add some variety to the roofline and would frame the Civic chamber, serving to enhance its prominence which appropriately reflects its function.

7.36 The angled roof over the plant room would further minimise the apparent mass, particularly from street level, while providing effective screening – both visually and acoustically – for the necessary plant and equipment.

7.37 The impact of the building’s mass on wind flow has been carefully considered in its design. Since the narrowest façade is perpendicular to the prevailing wind direction (south-west), any wind effects have been mitigated. The building elevations are broken down into a series of facets, which further allows the wind to flow more freely around the building while the horizontal reveals would reduce down draft.

7.38 The scale of the proposed ancillary buildings – the staff cycle store, the refuse store, and additional plant rooms – are appropriate considering their situation towards lower rise buildings to the north-west and against the boundaries of the site.

7.39 It is therefore considered that the proposal would relate well to the scale, height and massing of the adjacent townscape and would protect it and respect the proportions of neighbouring buildings, in accordance with the Local Plan and London Plan.

Façades

7.40 The south and west elevations would comprise of punched windows set within a faceted envelope that wraps itself around the building. This treatment would provide a degree of articulation while the deep reveals would also provide solar shading, reducing the energy needs of the building.

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Façade development to optimise daylight/insulation and create focal points.
7.41 At street level, the large amounts of glazing would create a highly active frontage, creating visual interest and increasing legibility by allowing passers-by and visitors to see what’s happening inside. The need for the inclusion of active frontages was one of the key principles of the Planning Brief for the site and it is felt that this would be achieved by the proposed design.

7.42 The public entrance to the building would be in the centre of the south-western elevation which faces towards the High Street. This is considered to be the ideal location for the entrance as it is envisaged that most members of the public would approach from this direction. The multi-storey vertical glazing treatment above the entrance draws the eye to its position, as does its recess at ground floor level.

7.43 Further multi-storey vertical glazing treatments on the south and north-east elevation serve to add variety to the façade treatment and highlight these important elevations.

7.44 The material proposed for the elevations – anodised aluminium and glazing – would complement the contemporary design of the building while serve to lighten its apparent mass. Aluminium is also regarded as a more sustainable material which lends itself well to manipulation (required by the design of the elevations). The aluminium would provide varying reflections and shading throughout the day as the light changes while the anodising would have a matt finish to reduce glare.

7.45 The surface finish of the public realm would consist of contrasting shades of grey paving, delineated by a demarcation band. The pattern of the contrasting paving would appear as a geometric river running around the southern and western elevations of the building. This treatment would break
up the expanse of hardstanding and add some variety and interest to the public realm. Other features to be incorporated into the public realm include metal bollards (required for security purposes) and concrete bollards near the entrance and café windows that double as seating.

**Landscaping**

7.46 There are two street trees (London Plane) in the southern section of the site that would have to be removed as part of the development. One tree is situated within the proposed footprint of the building, while the other would be within the realigned cycle path. It would not be possible to re-provide trees that would have the potential to fully mature in this section of the site due to the proximity of the building and carriageway.

7.47 One protected Sycamore which is outside the boundary would also have to be removed to make way for the development. The removal of this tree is subject to a separate application (00676/2-4/TPO8).

7.48 A detailed landscaping plan has been submitted which would see the introduction of 11 trees to the site; 6 in the north-east corner and 5 along the western boundary with the Gospel Hall. These trees would be between 5-6m when first planted. To supplement the trees, a variety of other plants and shrubs would be planted in nearby locations as well as a native-mix hedge along the western boundary. The proposed species are considered appropriate for their locations and would contribute positively to the street scene and ecology of the Town Centre. An acceptable Landscaping Management Plan has also been submitted which outlines how the proposed planting would be maintained.

7.49 Although the proposal would result in the loss of at least 3 trees, the site would see a net gain of 8 trees. These would be provided in more appropriate locations with sufficient pits to give them the best chance of reaching maturity and having an appreciable canopy spread.

**Summary**

7.50 In summary, it is considered that the development would deliver a high quality scheme, as envisaged by the Hounslow Town Centre Masterplan and the subsequent Bath Road Car Park Planning Brief, which relates well to its civic function and importance for Borough residents. Despite the relatively large scale of the development, it is considered that its form and massing responds well to the local context and that, through a number of means of articulation, the scale has responded to sensitive boundaries to minimise the impact on existing streetscapes. As such, it is considered that the proposal would be in accordance with the NPPF, the London Plan and the adopted Local Plan as identified above.

**Impact on neighbouring land uses**

7.51 To the south of the site, across Bath Road, there is a row of commercial properties, some with flats above approximately 20m away from the proposed building. To the west of the site, the closest residential property is Chestnut Court – a block of flats – approximately 45m away, before which
there are a number of commercial properties. To the north, 60m away from the main building, there are residential properties that face onto Bulstrode Road, while to the east, 50m away, the Central House building is being converted to flats.

7.52 A Daylight, Sunlight, Solar Glare, & Light Pollution Report has been submitted as part of the application. It concludes that the majority of surrounding residential properties would not experience a material change to their daylight and sunlight with the proposed development in place and, where there could be changes in daylight or sunlight, these would be well within the application of the BRE guidelines.

7.53 The solar glare analysis shows the glare effects from the façade of the proposed building would be of minor or negligible significance. Any glare created as a result of the implementation of the scheme should not present any risk to motor vehicle drivers, or cause disturbance or discomfort to pedestrians.

7.54 The light pollution study shows that, even when fully lit past working hours, the neighbouring residential buildings would not experience any light spill beyond those permissible under the Institute of Lighting Professionals guidelines.

7.55 Local Plan Policy CC2 expects proposals to minimise direct overlooking through careful layout, design and orientation of buildings, although it gives no minimum separation distances. The London Plan Housing Supplementary Guidance (2012) and the draft Housing SPG (2015) give a separation distance of 18-21 metres as a useful yardstick for privacy. It says, however, that rigid separation distances can limit the variety of urban spaces and housing types in the city and sometimes unnecessarily restrict density.

7.56 The proposed building would be approximately 20m from habitable room windows in upper floor flats along Bath Road to the south. Considering the town centre location and the expectation of higher densities with closer buildings, this separation distance would not have a harmful effect on neighbouring residents’ privacy levels and would comply with the intent of Policy CC2 of the Local Plan and the London Plan Housing SPG (2012) and draft Housing SPG (2015).

7.57 Whilst properties that surround the application at present generally enjoy an open outlook given the lack of development on the site, it is not considered that it is of particularly high value, nor representative of this town centre location.

7.58 While the proposal would marginally impact neighbouring residential properties in terms of daylight, sunlight and outlook, it is not considered that these impacts would result in significant harm to their amenity. As such, it is considered that the proposal would be in accordance with the NPPF, London Plan, and adopted Local Plan.

7.59 Concern has been expressed about the potential harm to neighbours’ living conditions during the construction phase of development, specifically in
terms of the noise and disruption. A condition which restricts the hours of construction is recommended to limit harm to neighbours however such disturbance is not a reason to refuse planning permission.

**Highways, Transport, and Access**

7.60 The NPPF requires all developments that generate significant amounts of movement to be supported by a Transport Statement or Transport Assessment (TA). Decisions should take account of whether:

- The opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;
- Safe and suitable access to the site can be achieved for all people; and
- Improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should only be presented or refused on transport grounds where the residual cumulative impacts of the development are severe.

7.61 The London Plan recognises that transport plays a fundamental role in addressing the whole range of his spatial planning, environmental, economic and social policy priorities. It is critical to the efficient functioning and quality of life of London and its inhabitants. It also has major effects - positive and negative - on places, especially around interchanges and in town centres and on the environment, both within the city itself and more widely.

- **Policy 6.1 emphasises the importance of closer integration of transport and development and seeks to achieve this by (inter alia):**
  - Encouraging patterns of development that reduce the need to travel, especially by car;
  - Seeking to improve the capacity and accessibility of public transport, walking and cycling, particularly in areas of greatest demand;
  - Supporting development that generates high levels of trips only at locations with high levels of public transport accessibility, either currently or via committed, funded improvements;
  - Improving interchange between different forms of transport, particularly around major rail and Underground stations, especially where this will enhance connectivity in outer London;
  - Facilitating the efficient distribution of freight whilst minimising its effects on the transport network;
  - Supporting measures that encourage shifts to more sustainable modes and appropriate demand management;
  - Promoting greater use of low carbon technology so that carbon dioxide (CO2) and other contributors to global warming are reduced;
  - Promoting walking by ensuring an improved urban realm; and
  - Seeking to ensure that all parts of the public transport network can be used safely, easily and with dignity by all Londoners, including by securing step-free access where this is appropriate and practicable.
7.62 Policy 6.3, regarding the effects of development on transport capacity, highlights that new developments that will give rise to significant numbers of new trips should be located where there is already good public transport accessibility with capacity adequate to support the additional demand.

7.63 Policy 6.7 sets out a number of requirements for new developments in respect of cycling, as follows:

- provide secure, integrated and accessible cycle parking facilities in line with the minimum standards set out in Table 6.3,
- provide on-site changing facilities and showers for cyclists,
- facilitate the Cycle Super Highways shown on Map 6.2,
- facilitate the central London cycle hire scheme.

7.64 Regarding parking, Policy 6.13 states that an appropriate balance must be struck between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use. New developments should not only adhere to the maximum car parking standards set out in Table 6.2 of the London Plan, but also meet the minimum disabled and cycle parking standards specified. In addition, new developments should ensure that 1 in 5 parking spaces provide an electrical charging point to encourage the uptake of electric vehicles, with a further 10% to be provided in the future.

7.65 Policy EC2 (Developing a Sustainable Local Transport Network) of the adopted Local Plan has regard to transportation and seeks to secure a more sustainable local travel network that maximises opportunities for walking, cycling and using public transport, reduces congestion, improves the public realm and improves health and well-being. It echoes the London Plan in terms of standards established for car parking, cycle parking, motorcycle parking, coach parking, and electric vehicle charging, along with any additional standards set out in supplementary guidance.

7.66 As described previously, the site has an excellent PTAL rating reflecting its location within Hounslow town centre and proximity to a range of public transport nodes. As a consequence, the scheme should seek to maximise the use of sustainable modes of transport (i.e. cycling, walking, bus, underground) given the high trip generating uses and level of employment proposed.

Proposed Vehicular Access

7.67 The site is currently in use as a public car park which has an in-and-out access arrangement. Entry to the car park is from Bath Road and is not signalised. Exit is to Lampton Road using a signalised junction.

7.68 The accesses to the site are shared with bus standing facilities. This provides permanent bus standing for the H22 as well as general use stands which are used when buses have to terminate in Hounslow town centre. There is also a public toilet located on the site.

7.69 There is an access to the rear of the site from Bulstrode Road along an adopted highway. This road provides rear access for properties on Lampton
It is proposed to close the existing accesses to Bath Road and Lampton Road with a new access provided to a basement car park at the western end of the site on Bath Road. This will require the removal of the existing traffic signal junction. However, the existing pedestrian crossing will be retained and enhanced and this will be secured by condition and in a s278 agreement.

The existing accesses will be permanently closed with all kerbs and footway reinstated. This will be secured by condition.

The new vehicular access will allow two-way traffic and will be controlled by a barrier. The geometry has been tracked and is satisfactory. Visibility splays will be provided in accordance with current guidance. The access will be designed to allow vehicles that try but do not gain access to the car park to turn and exit onto Bath Road in a forward gear. However it is noted that the restrictive height within the basement would prohibit the access of certain emergency vehicles to this level. Details of the arrangements to control access will be required and should be included in the Car Park Management Plan.

Light vans will be able to use the car park but all other servicing and deliveries will take place from Bulstrode Road.

The existing access to Bulstrode Road will be retained in order to provide access to a service yard. This will be controlled by a secure gate and a Delivery and Servicing Management Plan will be secured by condition to ensure that the service yard is managed in such a way as to ensure its safe and efficient operation.

Pedestrian access will be provided from Lampton Road. A new Toucan crossing will be provided in place of the existing car park exit and this will provide an enhanced pedestrian route from the High Street to the new Civic Centre.

The existing off-street cycle lane and crossing will be replaced by a shorter length of off-street cycle path which connects into the Toucan crossing. This will provide a safe route for those cyclists wishing to travel to the High Street.

A covered and secure cycle store is to be provided at the rear of the building adjacent to the service yard. The main access for cyclists will be from Bath Road along a secure access path. Access will also be possible from Lampton Road, along the side of the building, and from the service yard using a secure gate. The service yard will be strictly managed and a safe route marked out for cyclists.

Cyclists will then be able to access the building from a rear door. Changing, showering, drying, and storage facilities are provided in the basement. Separate male and female facilities are proposed.
Parking Provision

7.80 It is proposed to provide 43 car parking spaces within the basement car park. This will be limited to car club vehicles, emergency services and disabled parking only, with the exception of 2 loading bays for small vans. A total of 12 disabled parking bays will be provided with the remaining 31 parking bays provided for car club cars and emergency services. Use of the car park will be controlled by a Car Park Management Plan which will be secured by condition.

7.81 A total of 12 EV Charging Points are proposed but it is considered that additional passive provision should be secured to allow electric car club cars to be utilised in future. This can be secured within the Car Park Management condition.

7.82 It is not proposed to provide any general parking for staff. The council is introducing a Worksmart initiative which includes hot-desking and remote working. A Travel Plan will be secured and this will include advice for staff about their options for travelling to and from work. Similar ways of working have been introduced at other local authorities including Brent where no on-site parking is available for staff.

7.83 The Council already works in partnership Zipcar providing pool vehicles for staff who need to travel as part of their jobs. The number of cars available has recently been increased from 2 to 10 but it is considered that more will be required in the future and space for these will be secured in the basement car park with spaces provided as demand increases. This will be covered in the Car Park Management Plan.

7.84 It would be possible to provide additional disabled parking bays if required. These will be available for use by staff and visitors but use will need to be pre-arranged.

7.85 Other than pre-booked disabled parking, no specific visitor parking will be provided. There are a number of town centre car parks a short walk from the site that will be available for use by visitors. These include Montague Road, Alexandra Road, and the Treaty Centre. Visitors requiring a disabled parking space in the basement car park will be able to book one if required. This will be included in the Car Park Management Plan.

Car Park Layout

7.86 The car park layout is generally acceptable with parking spaces meeting minimum requirements. Manoeuvring into some spaces will be restricted but this would not render spaces unusable.

Parking Impact

7.87 No general staff parking will be available on-site. Any staff who need to drive to work will need to make alternative arrangements to do so. During the week, spaces are generally available within town centre car parks if required.
7.88 The town centre is covered by Controlled Parking Zones which operate for the duration of the day. Staff would not be eligible to park on-street on these roads.

7.89 Certain members of staff require permits that allow them to park on-street in order to undertake their duties. However, this prevents them from parking in streets close to the existing Civic Centre and would be replicated for the new Civic Centre.

7.90 The proposed development will result in the loss of the existing public car park which contains 120 parking spaces. Occupancy levels were recorded in 2014 as part of a review of town centre parking. This indicated occupancy levels of 43% on weekdays, 22% on a Saturday and 61% on a Sunday. Overall, the town centre car parks showed 46% occupancy on weekdays, 56% on Saturday and 61% on a Sunday. The higher occupancy levels on Sundays are a reflection of the fact that parking is currently free on this day. Therefore, based on current use the loss of this car park would not lead to a significant loss of capacity within the town centre.

7.91 However, it is acknowledged that in the future capacity will reduce, particularly with the reduction in parking resulting from the recent High Street Quarter permission. The parking review\(^1\) undertook a capacity study based on the potential loss of car parking as a result of development proposals within the town centre, as well as additional demand created by new developments. This indicates that by 2024 there could be a shortfall of up to 320 spaces on a Sunday. However, this assumes a maximum level of traffic generation from future developments and maximum loss of car parking (it should be noted that the High Street Quarter included more car parking than had been predicted) but does not include future changes in modal shift or changes to parking charges (which are currently free on a Sunday). A sensitivity test indicates that this could be significantly reduced if the predicted traffic generation does not happen.

7.92 It is not considered that this would be sufficient reason for this application to be refused.

7.93 Concern was raised from a resident of Chestnut Court that the loss of the car park would result in the loss of a convenient pick-up and drop-off location. It is noted that the Chestnut Court development does appear to have sufficient space for such activities, however, there is also ample space on streets within a similar distance from Chestnut Court, subject to their respective parking restrictions.

Trip Generation

7.94 The applicant has undertaken a trip generation assessment for the proposed use using the TRICS database which is standard practice and is considered to be acceptable bearing in mind the differences between the existing and proposed sites, and in particular the reduction in parking provision.

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\(^1\) Hounslow Parking Review (Sept 2014 – Systra)
Traffic Impact

7.95 The site is currently in use as a public car park and a bus stand. Traffic surveys were undertaken to obtain peak hour use of the car park. These surveys indicated that peak hour traffic generation was 36 in the AM peak hour (8-9am) and 95 in the PM peak hour (5-6pm). A total of 1041 daily vehicle movements were recorded (i.e. 520 vehicles entering and exiting the site).

7.96 The use of the car park will be strictly controlled and it is predicted that there would be 29 movements in the AM peak hour and 26 in the PM peak hour. This is a reduction of 7 and 69 movements respectively. Therefore, the proposed development is not considered to have a significant traffic impact.

7.97 The development has been assessed taking into consideration committed developments in the vicinity of the site and in particular the redevelopment of the existing Civic Centre site on Lampton Road and the High Street Quarter development. However, it is considered that although the latter would lead to increased traffic generation appropriate mitigation measures have been secured through that permission and the proposed new Civic Centre would not lead to any additional impacts.

Public Transport Impact

7.98 TfL has assessed the increase in public transport use and is satisfied that no additional capacity improvements will be required despite the predicted increased public transport use by staff travelling to and from work.

7.99 The proposed development will lead to the loss of the existing bus stand on the site. Following discussions with TfL an alternative location has been identified on Steve Biko Way. This will not lead to increased bus journey times or mileage. The existing first and last stops for passengers will be retained.

7.100 The new bus stands are currently undergoing detailed design but it will be possible to provide 4 stands, compared to the current 3, which is welcomed by TfL as it will provide additional bus standing capacity for any future increase to bus services to the town centre.

7.101 The new bus stands will need to be operational prior to commencement of construction, which will be secured by a ‘Grampian’ condition.

7.102 The public toilet, which is used by bus drivers, will need to be relocated and potential alternative locations have been identified and processes commenced for this to be relocated.

Servicing

7.103 The service yard will be accessed from Bulstrode Road. This is considered to be acceptable in principle. Delivery vehicles would not access the site from the west through the residential section of Bulstrode Road. Swept paths have been provided that indicate the service yard can accommodate vehicles of the required size but it will need to be actively managed and a
Delivery and Servicing Management Plan will be secured by condition to ensure that this happens.

7.104 The access road from Bulstrode Road is public highway and provides access to the rear of properties on Lampton Road. Waiting and loading restrictions will need to be introduced to ensure that it is kept clear at all times for access. This will require amendments to the existing Traffic Regulation Orders which can be secured by way of a ‘Grampian’ condition.

Cycle Storage

7.105 It is proposed to provide 106 covered and secure cycle parking spaces for staff in a dedicated cycle store at the rear of the site. Up to 46 visitor cycle parking spaces, also covered, are proposed at the front of the building. This conforms to minimum London Plan standards. The use of cycle stands will need to be monitored through the Travel Plan and additional stands provided if use is high.

7.106 The proposed cycle parking will utilise two-tier stands which is considered to be acceptable provided these include appropriate assistance for the upper stand (i.e. mechanical/pneumatic).

Travel Plan

7.107 A draft Travel Plan has been submitted which will need to be secured by condition. The Travel Plan measures will be implemented prior to occupation of the new building and will need to work alongside the introduction of the ‘Worksmart’ initiative being rolled out by the Council for all staff. The Travel Plan has been reviewed on behalf of the Council and amended in response to comments made. This will be a live document and subject to on-going review and monitoring.

Construction

7.108 TfL has produced guidance for Construction Logistics Plans and it is expected that all developments will comply with this guidance. A CLP has been submitted and is considered to be acceptable. This will be secured by condition.

7.109 Vehicles will be routed along Bath Road to the A4 and wider strategic road network to minimise conflicts with vehicles at other construction sites including the existing Civic Centre site and the High Street Quarter. A liaison group is to be established with contractors on this and other sites to ensure that construction impacts are mitigated as far as is possible. Road safety measures will need to be employed to ensure that the site operates in a safe manner for vulnerable road users in particular.

Summary

7.110 The proposal would include significant benefits in terms of the promotion of more sustainable modes of transport, including improved pedestrian links to and around the site as well as a significant provision of cycle storage across the site (employees and visitors).
7.111 Subject to further details and highway works, to be secured by condition, it is considered the proposal would be acceptable in highway safety terms and would not prejudice the safety of pedestrians or other road users.

7.112 It is therefore considered that the scheme would be in compliance with the objectives and policies of the NPPF, the London Plan and the adopted Local Plan.

**Inclusive design**

7.113 Inclusive Design works to eliminate the barriers that many people with disabilities have to face and to create a user friendly environment where everyone can function with equal ease. The aim of the design is to ensure that appropriate standards for accessibility are achieved to meet reasonable expectations for inclusive design and to ensure that the aims of the Equality Act 2010 for public and employee areas are met.

7.114 Noteworthy elements incorporated into the proposed design include:

- level access around the periphery of the building, including vehicular crossovers;
- all corridor and door widths have been sized to meet the requirements of Approved Document M of the Building Regulations 2010;
- all internal doors have 300mm space to the pull side of the leading edge of the door;
- main entrance and staff entrance to have level thresholds;
- doors fitted with automatic opening devices enabling wheelchair users and parents with pushchairs to gain independent access to/from the building;
- The main reception desk, library reception desk, and customer services desk would be designed to accommodate wheelchair users from both the public side and the receptionists’ side;
- Hard floor finishes would be utilised across the public accessible area and clear signage to enable independent navigation throughout;
- extra-wide gate at security for those with special access needs including wheelchair users;
- level access through all public spaces and office space;
- one disabled WC on every floor above basement for staff, and one disabled WC on every publically-accessible floor for members of the public including a changing places WC at ground floor.

7.115 It is felt that these measures and the overall design of the internal and external spaces would create a user friendly environment that all people, public and staff alike, can use without undue difficulty.

**Energy and Sustainability**

7.116 The broad aim of sustainable development is to ensure that the quality of social, economic and ecological environments are improved and maintained for future generations. The London Plan and adopted Local Plan encourage sustainable development through many policies including promoting the use of energy efficient building design and materials, re-use of previously developed land and existing buildings, and location of development in or
close to town centres and areas with good public transport. Sustainability is also a clear thread running through the NPPF.

7.117 Sustainability underpins many London Plan and local adopted policies. These require developments to be sustainable in transport terms, to minimise waste, include energy efficiency measures and promote use of renewable energy, and not significantly increase the requirement for water supply or surface water drainage.

7.118 As a comprehensive new development, the proposal can make a substantial contribution to sustainable development in the Borough and it is important that it recognises and adopts sustainable development principles.

7.119 The proposal constitutes the redevelopment of a previously developed site and in this instance is in accordance with sustainable development principles.

7.120 London Plan Policy 5.2 (Minimising carbon dioxide emissions) requires developments to make the fullest practicable contribution to minimising CO₂ emissions following this energy hierarchy:

- Be Lean: use less energy
- Be Clean: supply energy efficiently
- Be Green: use renewable energy

7.121 It goes on to note that major development proposals should include a detailed energy assessment to demonstrate how the targets for carbon dioxide emissions’ reduction outlined above are to be met within the framework of the energy hierarchy.

7.122 The Mayor aims to ensure that major developments reduce carbon dioxide emissions from buildings, by reaching higher than the Target Emission Rate (TER) outlined in the national Buildings Regulations, leading to zero carbon residential buildings from 2016. The Mayor has stipulated that between 2010 and October 2013 residential buildings should provide a 35% improvement on 2013 Building Regulations’.

7.123 Policy EQ1 of the Hounslow Local Plan seeks to minimise the demand for energy and promote renewable and low carbon technologies and Policy EQ2 aims to promote the highest standards of sustainable design and construction in development.

7.124 The applicant has incorporated the energy hierarchy into the design of the site in order to detail how a cumulative 35% carbon dioxide emissions reduction against a Building Regulations Part L (2013) baseline can be achieved. The associated BRUKL Report, detailing both the Target Emissions Rate (TER) and the Building Emissions Rate (BER), has been provided in order to support the ability to reduce the site’s carbon dioxide emissions.

7.125 The applicant has also demonstrated that they would achieve an Excellent BREEAM rating. This would be secured by condition.
7.126 To achieve the required sustainability targets the proposal has been designed to include a number of energy efficient and energy generating measures. These include increasing the level of thermal insulation and air tightness, the utilisation of an air source heat pump (ASHP) to provide site-wide space heating and cooling, and the installation of a 200m² photovoltaic array on the roof of the building.

7.127 These measures would support a much more energy efficient building and would contribute towards a financial saving of approximately £21 per m² of floor space (or a decrease of 78% on the current situation).

7.128 The Council’s Sustainability consultant has reviewed the information submitted and concludes that the development would meet the policy requirements in respect of reducing CO₂ emissions and sustainability. Therefore it is considered that the overall strategy proposed would ensure that the scheme would meet the sustainability targets set in the London Plan and the adopted Local Plan.

Other environmental considerations

Archaeology

7.129 The objective of Local Plan Policy CC4 (Heritage) is to conserve, protect and enhance the archaeological heritage.

7.130 The site lies within an Archaeological Priority Area as defined by the adopted Local Plan, associated with a Saxon village, site of the Priory of the Brethren of the Holy Trinity, and later an important coaching station to the West.

7.131 The applicant has commissioned and submitted a Historic Environment Assessment (MOLA 2014) and an archaeological evaluation (MOLA 2015) which has been submitted with the application.

7.132 Historic England’s archaeology advisor has reviewed the submitted information and concludes that it is evident that there is a low potential for significant archaeological remains to survive on site, with only 19th and 20th century remains of low significance being present. As such, no further assessment or conditions are therefore necessary.

Flooding

7.133 The Site is shown on the EA Flood Map for Planning8 to be located entirely in Flood zone 1 (Low Probability) which represents land assessed as having less than a 1 in 1,000 (0.1%) annual probability of flooding from rivers or the sea. Therefore, in accordance with the NPPF, the proposed development would be considered appropriate in flood risk terms.

7.134 A drainage strategy has been prepared on the basis of discharge being reduced to a maximum of 5 l/s. It has been estimated that, in order to provide such a reduction in discharge, an attenuation volume of approximately 220m³ would be required in order to accommodate a 1 in 100 annual probability event (including an allowance for climate change).
7.135 An attenuation tank is to be provided in the north-west of the Site. This is provisionally sized over a total area of 325m² to a depth of 0.8m in order to provide the required attenuation. This tank would accept drainage from the roof of the proposed building in the south of the site before discharging in a southerly direction to Thames Water sewers located south of the site.

7.136 A brown roof with varied growing medium substrates has been proposed to cover part of the 120m² roof of the plant room at the top of the building. In order to achieve a BREEAM ‘Excellent’ rating, at least 25sqm of brown roof will be required. Brown roofs colonise naturally therefore encouraging local biodiversity to thrive. As listed in Encon’s Ecology Report, the aim is to create a mosaic of open bare ground and low-growing vegetation. This will provide a habitat for variety of invertebrates and black redstarts, a key species listed in the Hounslow Local Biodiversity Action Plan. This aim also means that no on-going management should be required. The brown roof would also provide a degree of rainwater attenuation however this is likely to be negligible.

7.137 Responsibility for managing surface water flooding and other flood events has recently passed from the Environment Agency to Lead Local Flood Authorities (LLFA). The Council’s Flood Risk Management Consultant has reviewed the submitted information and welcomes the inclusion of the brown roof within the development and the infiltration rates, however expressed disappointment that rainwater harvesting measures would not be incorporated in the scheme.

7.138 A detailed maintenance plan can be submitted alongside the detailed drainage designs as part of a pre-commencement condition for the application.

Contaminated land

7.139 Owing to the history of uses, there may be some contamination. The NPPF advises where there is suspicion, or where evidence suggests there may be some contamination, planning permission may be granted subject to condition that development may not start before site investigation and assessment have been done and that the development itself will incorporate any remedial measures necessary. Policy 5.21 (Contaminated Land) of the London Plan and adopted Local Plan Policy EQ8 (Contamination) provide a policy context for this matter. A condition is proposed to ensure that, provided the appropriate mitigation measures are implemented, there would be no risk of contamination.

Air Quality

7.140 The NPPF states that (para 109) “the planning system should contribute to and enhance the natural and local environment by…. preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability.”

7.141 London Plan Policy 7.14 (Improving Air Quality) states that development proposals should: Promote sustainable design and construction to reduce
emissions from the demolition and construction of buildings following the best practice guidance in the GLA and London Councils’ ‘The control of dust and emissions from construction and demolition’. Where biomass boilers are included, set out a detailed air quality assessment that should forecast pollutant concentrations. Permission should only be granted if no adverse impacts from biomass are identified; and aim to be ‘air quality neutral’ and not lead to further deterioration of existing poor air quality (such as areas designated as AQMAs).

7.142 The Borough has undertaken a review and assessment of air quality as required by the Environment Act 1995. This has concluded that the level of pollution (the air quality objective for 2005 for nitrogen dioxide) will not be met and led to the declaration of Air Quality Management Areas (AQMAs).

7.143 The application site is within the AQMA that covers the whole Borough and by definition suffers from poor air quality. Thus, careful consideration needs to be given to granting planning permission for residential accommodation, particularly to the type of accommodation where people may have very little choice in the location. However, AQMAs do not differentiate levels of pollution between different areas and, in reality, there may well be differences on the ground. Whilst the designation of an AQMA is indicative of a certain level of air quality, this in itself does not prevent development in such areas.

7.144 Adopted Local Plan Policy EQ4 (Air Quality) states that the Council’s objective is to seek to reduce the potential air quality impact of development, in line with the Air Quality Action Plan, and that development proposals are expected to carry out air quality assessments for major developments and consider the potential impacts of air pollution from the development on the site and neighbouring areas and incorporate mitigation measures where air quality assessments show that developments could cause or exacerbate air pollution, or where end users could be exposed to air pollution.

7.145 The recycling of previously developed land for a civic use, coupled with pedestrian and cycling improvements, the significant reduction of vehicular movements to and from the site, and the removal of the bus stand would all suggest that the proposal would have a neutral effect on air quality in the vicinity.

7.146 Internal air quality would be controlled by way of non-opening windows and high level clean air intakes to ensure that the air quality is at an acceptable level for all users of the building.

7.147 Notwithstanding the above, a range of mitigation measures in relation to transport improvements is proposed and will demonstrate that the proposed development will contribute towards the delivery of a number of the Action Commitments from LB Hounslow’s Air Quality Action Plan. An example of this would be the travel plan which would use measures to encourage modal shift (encourage people to use sustainable modes of transport rather than private vehicles) as well as measures to encourage cycling (providing a good level of cycle facilities for future residents and visitors).
7.148 It is therefore considered that the proposed development would be acceptable in respect of potential impacts on air quality and would be in broad compliance with the NPPF, the London Plan and local policies, subject to safeguarding conditions.

Ecology

7.149 At a national level, the NPPF states that the planning system should contribute to and enhance the “natural and local environment by:

a) Protecting and enhancing valued landscapes, geological conservation interests and soils;

b) Recognising the wider benefits of ecosystem services;

c) Minimising impacts on biodiversity and providing net gains in biodiversity, where possible contributing to the Government’s commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;”

7.150 London Plan Policy 7.19 (Biodiversity and access to nature) states that “development proposals should wherever possible make a positive contribution to the protection, enhancement, creation and management of biodiversity”.

7.151 Adopted Local Plan Policy GB7 (Biodiversity) seeks to protect and enhance the Borough’s natural environment and seeks to increase the quantity and quality of the Borough’s biodiversity.

7.152 Given the existing use of the site and its location with the town centre, levels of biodiversity and ecology are generally considered to be low.

7.153 A number of general recommendations for ecological enhancement of the site are outlined within the Ecological Report such as a roof top habitat, bird nest boxes, and fruit and berry bearing tree and shrub species. A condition securing the implementation of these recommendations is advised.

7.154 The Phase 1 study also identified a small stand of Japanese knotweed in the north-western corner of the site. The spread of Japanese Knotweed is covered under the Wildlife and Countryside Act 1981 while any Japanese Knotweed contaminated soil that is removed from a site is classified as “controlled waste” and is covered by the Environmental Protection Act 1990. A condition is recommended which requires that all the Japanese Knotweed on the site is eradicated before any development takes place. This would not override any other obligations under the Wildlife and Countryside Act or the Environmental Protection Act.

Noise

7.155 The internal noise climate within the proposed development will ultimately consist of varying contributions from noise ingress through glazed aspects of the façade and noise generated as a result of mechanical services servicing the building.
7.156 The following instruction is provided within the BCO guidelines regarding maximum/impulsive noise levels:

“In addition, LA_{max} (fast) noise intrusion levels should not normally exceed 55 dBA in open plan/speculative offices or 50 dBA in cellular offices. “

7.157 A Noise Break-in Assessment has been submitted which has indicated that mitigation will be required due to road traffic and aircraft noise around the site. A typical glazing specification to achieve the required internal noise levels has been proposed. The final details of the glazing specification will be required to ensure end-users of the building are adequately protected from external noise and should take into consideration the recommendations of this assessment. This would be secured by condition.

7.158 In addition to the standard plant items there would be an emergency generator. This would only operate during a power failure or when being tested. The testing times for the generator are proposed to be restricted to an hour period between 09:00 and 18:00 on weekdays and would only be expected to be required once a fortnight.

7.159 To prevent harm to nearby residents by way of noise and disturbance from running the emergency generator, a condition is recommended to be attached to the consent which limits the noise levels at the nearest residential window.

8.0 EQUALITIES DUTIES IMPLICATIONS

8.1 The Council has to give due regard to its Equalities Duties and in particular with respect to its duties arising pursuant to the Equality Act 2010, Section 149. It is considered that there will be no specific implications with regard to the Council’s duty in respect of its equalities duties and that, if approving or refusing this proposal, the Council will be acting in compliance with its duties.

9.0 COMMUNITY INFRASTRUCTURE LEVY

9.1 Some new developments granted planning permission will be liable to pay Community Infrastructure Levy (CIL) to the Mayor of London and Hounslow.

9.2 CIL is payable on m^2 of new floor space or where a new dwelling is created or the net floor area increase exceeds 100 m^2.

<table>
<thead>
<tr>
<th>Mayor’s £35 per square metre</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hounslow:</td>
</tr>
<tr>
<td>Housing:</td>
</tr>
<tr>
<td>East £200/m^2</td>
</tr>
<tr>
<td>Central £110/m^2</td>
</tr>
<tr>
<td>West £70/m^2</td>
</tr>
<tr>
<td>Supermarkets,</td>
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<tr>
<td>supermarkets,</td>
</tr>
<tr>
<td>and retail warehouses:</td>
</tr>
<tr>
<td>£155/m^2</td>
</tr>
<tr>
<td>Health care,</td>
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<tr>
<td>education and</td>
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<tr>
<td>emergency services</td>
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<tr>
<td>facilities: £0</td>
</tr>
<tr>
<td>All other uses: £20/m^2</td>
</tr>
</tbody>
</table>

9.3 This proposal would be liable to pay a Community Infrastructure Levy charge of £563,360 for the Mayor and £321,920 for Hounslow based on an internal floor area of 16,096 square metres.
10.0 CONCLUSION

10.1 The proposal would result in the re-development of this prominent site within Hounslow Town Centre, which would facilitate the release of the existing site to deliver much needed housing, including a substantial provision of affordable housing on that site. The relocation of the Civic functions of the Council back to the town centre will assist in the regeneration of Hounslow Town Centre, reintegrating these functions with the wide range of other services and facilities available in this highly sustainable location.

10.2 The scheme is considered to be of a high design quality, suited to the existing site and surroundings and which would provide a new, distinctive landmark building for the Council’s civic functions. The building’s articulation through its façade treatment will help to break-up the massing of this building, but will also aid legibility and provide a visual, sustainable element to the building through the provision of solar shading on the southern/western elevations. The proposal would increase the amount of public realm around the site, providing enhanced connectivity with the High Street through the provision of a new toucan crossing, as well as an enhanced pedestrian environment around the site.

10.3 By being located within the town centre, with its excellent public transport connections, car movements to/from the site will be reduced from the existing situation, whilst it is noted that there is sufficient public car parking availability elsewhere in the town centre and as such the loss of the current parking would not have a detrimental impact on the availability of car parking in the town centre and would ensure this would remain an attractive destination for all visitors. Furthermore, the proposal would include a number of sustainable transport measures, including a Travel Plan to promote alternative modes of transport, which would work alongside the Council’s ‘Worksmart’ initiative to promote a shift in working practices.

10.4 As such, it is considered that the scheme is an appropriate response for the planning framework for the area and it will bring substantial benefits to the environmental, social and economic well-being of the area, notably those arising from the regeneration this scheme will bring to Hounslow Town Centre with limited amenity impacts to nearby residential properties. Overall, the proposal would be in accordance with the objectives and policies of the NPPF, the London Plan and the Local Plan.

11.0 RECOMMENDATION

APPROVE SUBJECT TO THE FOLLOWING SAFEGUARDING CONDITIONS
Conditions:

1. Time limit to implementation
2. In accordance with approved plans
3. In accordance with submitted Construction Management/Logistics Plan
4. BREEAM Excellent
5. Sustainable construction
6. Waste and recycling facilities
7. Materials
8. Parking, loading, turning spaces
9. Vehicular Access points
10. Cycle storage
11. Energy Strategy
12. Car Park Management Plan
13. Delivery and Servicing Plan
14. Land Contamination
15. Landscaping
16. External ducts/vents etc
17. Ecology
18. Highway works (including relocation of the bus stand, toucan crossing, footway reinstatement and TRO amendments to service road off Bulstrode Road).
19. Travel Plan
20. Drainage and Drainage Maintenance Strategy
21. Air Quality
22. Hours of construction
23. Restriction on delivery hours
24. No additional aerials or satellite dishes
25. Emergency generator condition
26. Noise insulation
27. External lighting
Informatives:

1. To assist applicants, the London Borough of Hounslow has produced planning policies and written guidance, which are available on the Council's website. The Council also offers a pre-application advice service. In this case, the scheme was submitted in accordance with guidance following pre application discussions.

2. We collect the Mayor of London's Community Infrastructure Levy (CIL) at the rate of 35 pounds per sq.m of new floor space. Hounslow's Community Infrastructure Levy (CIL) has been adopted. For details of the rates please refer to our web page:

http://www.hounslow.gov.uk/index/environment_and_planning/planning/planning_policy/community_infrastructure_levy.htm

This development is liable for CIL. A Liability Notice will follow shortly. For further information please contact the CIL team on 020 8583 4898/4895 or view our web page:

http://www.hounslow.gov.uk/index/environment_and_planning/planning.htm

or the planning portal web page:

http://www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/cil

3. Given the nature of the proposed development it is possible that a crane may be required during its construction. We would, therefore, draw the applicant’s attention to the requirement within the British Standard Code of Practice for the safe use of Cranes, for crane operators to consult the aerodrome before erecting a crane in close proximity to an aerodrome. This is explained further in Advice Note 4, ‘Cranes and Other Construction Issues’ (available at http://www.aoa.org.uk/policiesafeguarding.htm

Drawing Numbers:

Received 10/12/2015:
Landscape Management Plan, 400001 Rev A, dated 07/12/15
General Arrangement Plan 1/3, 100001 Rev A, dated 07/12/15
Roof General Arrangement Plan, 100004 Rev A, dated 07/12/15
Detailed Planting Plan, 200001 Rev A, dated 07/12/15
General Arrangement Plan 3/3, 100003 Rev A, dated 07/12/15
General Arrangement Plan 2/3, 100002 Rev A, dated 07/12/15
Tree Pit Detail with Services, 300004 Rev A, dated 07/12/15
Flood Risk Assessment Rev 2, dated 02/12/2015
Transport Assessment, 002 Issue 004, dated 08/12/2015
Day Light Sunlight Solar Glare & Light Pollution Report, dated December 2015
Air Quality Assessment, dated December 2015
Planning Statement, dated 9 December 2015
Noise Break-in Assessment, 15/0496/R02-2, dated 3 December 2015
Heritage Report, dated 7th December 2015
Statement of Community Engagement, dated 9 December 2015
Design and Access Statement, dated December 2015
Boundary Treatment Details 1/3, 300001 Rev A, dated 07/12/15
Boundary Treatment Details 3/3, 300003 Rev A, dated 07/12/15
Boundary Treatment Details 2/3, 300002 Rev A, dated 07/12/15

Received 11/12/2015:
Section CC, 5381-00-252 Rev A, dated 07/12/15
Section AA, 5381-00-250 Rev B, dated 07/12/15
General Arrangement Service Yard Ground & Roof Plan, 5381-00-210, dated 07/12/15
General Arrangement Roof Plan, 5381-00-209 Rev B, dated 07/12/15
General Arrangement Roof Plan, 5381-00-208 Rev B, dated 07/12/15
General Arrangement Fifth Floor Plan, 5381-00-206 Rev B, dated 07/12/15
General Arrangement Ground Floor Plan, 5381-00-201 Rev B, dated 07/12/15
General Arrangement Basement Floor Plan, 5381-00-200 Rev B, dated 07/12/15
Service Yard Sections, 5381-00_253, dated 07/12/15
Section BB, 5381-00-251 Rev A, dated 07/12/15
Location Plan, 5381-00-001 Rev B, dated 07/12/15
Service Yard - Elevations - Sheet 01, 5381-00_408, dated 07/12/15
Service Yard - Elevations - Sheet 02, 5381-00_409, dated 07/12/15
General Arrangement Sixth Floor Plan, 5381-00-207 Rev B, dated 07/12/15
General Arrangement Fourth Floor Plan, 5381-00-205 Rev B, dated 07/12/15
General Arrangement Third Floor Plan, 5381-00-204 Rev B, dated 07/12/15
General Arrangement Second Floor Plan, 5381-00-203 Rev B, dated 07/12/15
General Arrangement First Floor Plan, 5381-00-202 Rev B, dated 07/12/15

Received 25/01/2016:
Historic Environmental Assessment, dated December 2015
Land Contamination (Geoenvironmental) Assessment, dated December 2015
Archaeological Evaluation Report, dated September 2015
Ecological Report to Inform BREEAM Assessment, A2680, dated 23 October 2015
Arboricultural Assessment, dated December 2015

Received 12/02/2016:
Report on Ground Investigation Final Issue, dated 03/12/15

Received 18/02/2016:
General Arrangement Ground Floor Plan, 020201 Rev C, dated 29.01.16
JMP response to LBH comments, dated 18 February 2016
JMP response to TfL comments, dated 18 February 2016
Swept Path Analysis of Small Skip Lorry and Rigid Truck in Servicing Yard,
ST16030-67 Rev B, dated 17/02/2016
Proposed Off-Site Highway Works, ST16030-48 Rev B, dated 18/02/16
Swept Path Analysis of Light Van and Car in Basement Car Park, ST16030-87, dated 17/02/2016
Framework Travel Plan Issue 2, dated 26/01/2016
General Arrangement Basement Floor Plan, 020200 Rev C, dated 29.01.16
Bay Studies_Panel Type 3_Flat profile, 5381-00-452 Rev A, dated 18.02.2016
Boundary Treatment Details 1 of 3, 300001 Rev A, dated 02-12-15
Bay Studies_Panel Type 1_3D sculptural profile, 5381-00-450 Rev A, dated 18.02.2016
Bay Studies_Panel Type 2_3D profile, 5381-00-451 Rev A, dated 18.02.2016
North Elevation, 5381-00-403 Rev B, dated 18/02/2016
West Elevation, 5381-00-402 Rev B, dated 18/02/2016
South East Elevation, 5381-00-400 Rev B, dated 18/02/2016
South Elevation, 5381-00-401 Rev B, dated 18/02/2016

Received 23/02/2016:
Sustainability and Energy Statement Rev 6, dated 19.02.16

Received 26/02/2016:
Note on Location of Air Intakes, undated
410.05491.00003_L_New Hounslow Civic Centre AQA Ventilation Assessment, dated 26th February 2016
Drainage evolution note, undated
Drainage strategy note, undated