PLANNING COMMITTEE

3rd November 2016
stephen.hissett@hounslow.gov.uk

References: P/2016/3939 00707/714-746/P21
Address: Former Hounslow House, 714-746 London Road, Hounslow TW3 1PD
Proposal: Redevelopment of the site to provide buildings of varying height between 2 and 11 storeys above ground, comprising 293 residential units (Use Class C3) and 926sqm of flexible commercial floorspace (Use Class A1-A3 / B1 / D1) together with associated car parking, cycle parking, landscaping and infrastructure works.

Ward: Hounslow Central

This application is a Major development with a S106 agreement

1.0 SUMMARY

1.1 The proposal is for the re-development of the site to provide a residential-led mixed-use scheme with 293 residential units and 926sqm of flexible commercial floorspace. The proposals would include creation of a new link to the east-west footpath linking North Drive and Kingsley Road, with further landscaping within the site and car parking with access from London Road. The development would range from two to 11 storeys in height.

1.2 The scheme is considered to be of a high design quality that would be well suited to the site and surroundings. It’s location within Hounslow Town Centre would assist with the on-going regeneration of the town centre and is considered to include a mix of uses that would be suited to this highly sustainable location with excellent links to public transport. The proposals would give rise to limited amenity and transport issues, with the benefit of much needed affordable housing (38 units/13%) on site and public realm improvements.

1.3 The application is recommended for approval subject to conditions and a section 106 agreement.

2.0 SITE DESCRIPTION

2.1 The scheme relates to a 1.22 ha site that contained the Hounslow House office building (including retail units at street level) and the Black Arrow industrial premises to its rear, all served off London Road at the eastern end of Hounslow Town Centre.

2.2 The previous buildings have been demolished and the site is now clear.

2.3 The southernmost part of the site is located within the defined Hounslow Town Centre boundary. Hounslow Town Centre is identified as one of twelve ‘Metropolitan Centres’ in London within the London Plan. The site is allocated in the Local Plan as being for a mixed residential and commercial use.
2.4 Previously the site was divided into two parts; Hounslow House, which fronted London Road, was a 7-storey building (24 metres in height) incorporating approximately 1,100sqm (gross) retail floorspace in four retail units at ground floor level and 6,500sqm (gross) office floorspace, together with 100 associated car parking spaces at grade. The Black Arrow site to the rear (north of Hounslow House) contained a three-storey office block of some 900sqm (gross), a warehouse unit of 5,000sqm (gross) and a number of ancillary buildings, car parking spaces (circa 30) and lorry parking/turning area. This building was built right up to the eastern boundary, shared with North Drive.

2.5 Overall, the site falls from back to front (London Road) by 1.4m approximately.

2.6 The site is located within Hounslow Town Centre and the main shopping area of Hounslow Town Centre is located approximately 250m to the west of the site and has Public transport accessibility level of 6b (the highest level). The site benefits from being adjacent to Hounslow Bus Depot and in close proximity to Hounslow East Underground Station (served by the Piccadilly Line). In addition a number of bus routes serve the site connecting Hounslow with amongst others Isleworth, Brentford, Chiswick and Richmond. It is within the Hounslow Town Centre North Controlled Parking Zone.

2.7 The site is bound to the south by London Road, with retail uses and terraced properties directly opposite. To the east is Aces Court a mixed use (residential led development) and to the north-east (behind Aces Court) are semi-detached houses fronting North Drive. The rear gardens of these dwellings abut the application site. A number of outbuildings are located within the rear gardens of these houses. The area beyond North Drive to the north and east is predominately residential in character of suburban two-storey housing.

2.8 Kingsley Road is to the west beyond the bus depot site and contains predominantly two storey buildings of a mix of commercial at ground floor and residential uses at upper floors. Further along London Road to the south is Madison Heights, a 10 storey building with retail and commercial uses at ground floor, offices use at first floor and residential use on the upper floors.

2.9 Hounslow Bus Station and garage abuts the west of the site. The northern boundary of the site is the shortest, and is bound by a pedestrian footpath, which links North Drive to the east with Kingsley Road to the west.

2.10 Hounslow East Underground Station, on the Piccadilly Line is 400m to the north along Kingsley Road.

2.11 The site is not within a Conservation Area however it does lie within an Archaeological Priority Area. There are no listed buildings on or near to the site.

3.0 HISTORY

3.1 00707/714-746/P19 Redevelopment to provide retail store and ancillary uses (Class A1), retail unit(s) (Class A1/A2/A3), car and cycle parking, servicing, pedestrian and vehicular access, landscaping, public realm and associated works.
3.2 00707/714-746/P20 Redevlopment of site involving the erection of 250 residential units, 2,453sqm of A1, A2, A3, B1 and D1 floorspace over 9 buildings between 3 and 21 storeys, car and cycle parking, servicing, pedestrian and vehicular access, hard and soft landscaping, public realm and associated works

Refused 08/05/2015

Appeal pending: inquiry due to be held 22nd-30th November 2016

4.0 DETAILS

4.1 The application proposes the redevelopment of the site for a mixed-use, residential-led development consisting of 293 new dwellings and 926sqm of flexible commercial floorspace (Use Classes A1-3/B1/D1) together with associated parking and landscaping.

4.2 The proposals can be defined into three distinct areas; the south block, fronting onto London Road with the ground floor commercial space and residential above, the north block, situated along the north-west boundary being wholly residential with communal amenity space at ground level and a line of 14 mews houses along the eastern boundary of the site. A new north-south access route through the site forms a 'spine' through the development, linking London Road with the east-west footpath at the northern end of the site. This will be a shared space, albeit with measures to control vehicle speeds and give pedestrians priority.
South Building

4.3 This has been arranged as a perimeter block of four elements over a double height podium, with the commercial space fronting onto London Road. This block contains the tallest element (Block A), at 11 storeys, which will be situated towards the western side of the site overlooking the bus garage. Blocks D & E would be seven storeys fronting onto London Road, with the double height commercial space at ground level. The main entrance to this building is between Blocks C and D, where residents will enter a managed entrance and proceed to the first floor podium where all four blocks can be accessed. Blocks B and C will make up the northeast corner and eastern element of this building respectively, containing one-bedroom open plan units with mezzanine sleeping accommodation at ground level before extending to four and three storeys in total respectively.

North Building

4.4 This building comprises an ‘L’-shaped footprint that sits against the diagonal wall of the neighbouring bus garage with an enclosed area of shared amenity space at ground level. This consists of Blocks F-J ranging from six storeys (the 6th set-back) to five storeys (the 5th set-back).

Mews houses

4.5 These comprise 14 three-bedroom houses fronting onto the new access through the site. The houses would be two storeys in height with a roof pitch into the site so that along the access they would be 2.5 storeys. Each house would have a private courtyard at ground level and terrace at first floor. The houses would be easterly facing with no windows on the western elevation (towards North Drive). Each home would have a single on-street parking space.

4.6 The proposal would comprise the following dwelling/tenure mix:

<table>
<thead>
<tr>
<th>Unit type</th>
<th>Number</th>
<th>Private Sale</th>
<th>Shared Ownership</th>
<th>Affordable Rent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Studio</td>
<td>23 (8%)</td>
<td>23</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>1B2P</td>
<td>94 (32%)</td>
<td>87</td>
<td>6</td>
<td>1</td>
</tr>
<tr>
<td>2B3P</td>
<td>38 (13%)</td>
<td>31</td>
<td>3</td>
<td>4</td>
</tr>
<tr>
<td>2B4P</td>
<td>111 (38%)</td>
<td>95</td>
<td>10</td>
<td>6</td>
</tr>
<tr>
<td>3B</td>
<td>27 (9%)</td>
<td>19</td>
<td>0</td>
<td>8</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>293</strong></td>
<td><strong>255 (87%)</strong></td>
<td><strong>19 (6.5%)</strong></td>
<td><strong>19 (6.5%)</strong></td>
</tr>
</tbody>
</table>

4.7 All of the affordable housing would be provided in the North Building; Block H would contain the 19 affordable rent units (including seven wheelchair accessible units) with the remaining 19 shared ownership units provided in Block J (including two wheelchair accessible units). A further 20 wheelchair accessible units will be provided across the site (10% total built to M4(3) Building Regs.)
4.8 The proposal will have a residential density of 250 dwellings per hectare (653 habitable rooms per hectare) based on the provision of 293 dwellings (764 habitable rooms) on the residential area of 1.17 hectares (this excludes the site area of the commercial space, c.4% of the site area).

4.9 Over half (53%) of the units would be dual aspect. There would be no single-aspect, north facing units – single aspect units would range from 30 degrees northeast around to 30 degrees northwest. All units would have direct access to private amenity space in the form of balconies, winter gardens, gardens or terraces. A total of 1,807sqm of communal amenity space will be provided across the site which includes some 281sqm of child’s play space for under 5’s.

4.10 The commercial floorspace has been designed to maximise active frontage to London Road, and whilst shown as a single space, can be subdivided to into smaller unit sizes should these prove more attractive to end users.

4.11 Two access points from London Road will be retained. The western access, close to the bus garage entrance will be a controlled point of access for deliveries and servicing, with occupiers of the wheelchair spaces also having access. The eastern access would be the main access point for residents and forms the main vehicular and pedestrian entrance to the site with enhanced landscaping and public realm improvements at this frontage.

4.12 A total of 48 car parking spaces will be provided; 14 spaces allocated to the mews houses, 29 accessible spaces allocated to the wheelchair accessible units, two spaces allocated to a Car Club operator, one accessible space allocated to the commercial unit(s) and two short stay spaces (less than 20 minutes) for visitors to the commercial unit(s).

4.13 A total of 533 cycle spaces will be provided on site, comprising; 473 long term spaces allocated for the proposed residential units and arranging around circulation cores; eight short stay spaces for visitors to the residential units, 26 short stay spaces allocated to the commercial unit(s) and 26 public cycle spaces spread throughout the public realm.

4.14 Refuse/recycling stores will be located throughout the development at ground floor level, close to residential entrances, and to the rear of the commercial space. On collection days, the on-site concierge will collect the bins in the South Block and place them in the holding area at the base of Block A for collection. Refuse vehicles will enter the site via the western access with a turning head provided at the northern end of the site to minimise reversing manoeuvres within the site.

4.15 The development will achieve a 35% carbon dioxide reduction through the use of sustainable design and construction measures, the inclusion of a site-wide CHP network and the provision of PV panels and air-source heat pumps. In addition to this, the non-residential floorspace will achieve a BREAAM ‘Excellent’ rating.

5.0 CONSULTATIONS

5.1 684 neighbour notification letters were sent on the 08/09/2016. Two site notices were displayed on the 04/107/2016 and a press notice was published on the 16/09/2016. Three objections have been received which have been summarised
as follows:

<table>
<thead>
<tr>
<th>Comment</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>The proposed development is more in keeping with the area [than the previous proposals], but it is still too overdeveloped and a limit should be placed on the height of Block A at 7 or 8 storeys (same as the other blocks) and have fewer mews houses so that there is much more green space on the site.</td>
<td>It is considered that the height, massing and design has been well considered for this town centre site and represents an appropriate transition across the site that respect the urban character of the area and existing residents’ amenity. The overall site coverage is considered to be appropriate, with significant public realm benefits alongside open spaces for residents.</td>
</tr>
<tr>
<td>Concerns about the number of cars that would try and enter London Road in peak hours. Although it appears that cars would exit left out of the site, this would not be safe as there is currently a bus stop at the site and there are often two or three buses at the stop. Also, there is nowhere for cars to turn right nor allowances for cars travelling in the opposite directions to enter the site which in practice will cause unsafe entry and exit to the site.</td>
<td>Vehicle movements to/from are expected to be low given the low level of car parking on the site and as such it is not considered there would be a significant impact on London Road. The new access arrangements would be subject to a Road Safety Audit which would form part of the S278 works.</td>
</tr>
<tr>
<td>There are also insufficient road crossings currently and numerous people getting off buses opposite the bus station in peak times have caused a number of near accidents.</td>
<td>There is a zebra crossing immediately adjacent to the site and a further signalised crossing at the junction of London Road/Kingsley Road. The central ‘island’ on London Road will be retained which provides a refuge for pedestrians informally crossing this road. These arrangements are considered satisfactory for this development.</td>
</tr>
<tr>
<td>The enhancements to the footpath at the northern end of the site will not be sufficient and this link should not be included.</td>
<td>The north-south route for the site is a desirable link to Hounslow East Underground station and will promote permeability and connectivity at this end of the town centre, negating the need to navigate around the bus garage and conflicts with bus movements. The enhancements along this</td>
</tr>
<tr>
<td>Concerns regarding overlooking from the mews houses from any side windows or terraces and from the higher flats.</td>
<td>No habitable room windows would directly overlook neighbouring gardens from these mews houses. Privacy screens adjacent to first floor terraces are proposed to prevent direct overlooking from these spaces. This is considered to be an appropriate relationship to maintain residents’ privacy.</td>
</tr>
<tr>
<td>---</td>
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</tr>
<tr>
<td>Whilst the retention of the existing boundary wall along the eastern edge is welcomed, concerns that this will not be high enough to ensure security/privacy.</td>
<td>An extension to the northern end of the existing boundary wall is proposed to enhance security in this location. The passive surveillance created by the arrangement of the adjacent flats/houses and location of the on-site concierge will enhance security along this boundary.</td>
</tr>
<tr>
<td>Lack of parking will put pressure on local roads for on-street parking and an extension to the CPZ hours will do little to stop this.</td>
<td>This is a highly accessible location and the low levels of car parking is supported through policy alongside other sustainable travel including cycle provision, travel plan, car club, etc.</td>
</tr>
<tr>
<td>The development will lead to additional congestion on London Road.</td>
<td>The low levels of parking on site are unlikely to lead to significant additional congestion on London Road.</td>
</tr>
<tr>
<td>Social infrastructure concerns (i.e. additional residents putting pressure on NHS services, etc.)</td>
<td>The development will be CIL liable.</td>
</tr>
<tr>
<td>What restrictions will be placed on the commercial uses; the last thing the area needs is another betting shop or pawnbroker.</td>
<td>Permission is sought for a flexible use (A1-3/B1/D1). Betting shops are a “sui generis” use and as such planning permission would be required.</td>
</tr>
<tr>
<td>Concerns of impact during the construction phase of the development.</td>
<td>Disruption during construction activity is an inevitable consequence of new development in the short term, but conditions are proposed to minimise this</td>
</tr>
</tbody>
</table>
The proposals, which have been modified by taking into account the views and wishes of local residents on North Drive (and Aces Court) on the whole are very much less objectionable than the previous proposals.

Any entrance/exit to the new footpath through the site should be solidly and securely blocked to prevent the entry/exit of any vehicles other than bicycles. The landscaping arrangements would include discreet measures to prevent this.

Trees off-site should be retained. The existing trees along the footpath at the northern end of the site add to the current issues experienced along this footpath, their removal would allow the opening up of this path and the access to the path, enhancing security and accessibility.

The pedestrian ‘island’ along London Road should be retained. Noted.

5.2 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: The proposed mixed-use, residential led development in Hounslow Town Centre is strongly supported in terms of land use and regeneration.

- Housing: The provision of only 15.9% affordable housing in this scheme is unacceptable. The applicant’s viability assessment should be robustly interrogated and all options explored to increase affordable housing provision. The Council should ensure that the proposed housing mix meets local needs. Additional on-site children’s play space should be provided. Further details on sound insulation and air quality should be provided.

  Response: additional door-step play has been provided in the South Block (120sqm) to bring the total provision across the site to 400sqm. Details on sound insulation and air quality would be secured by condition.

- Urban design: The layout, height, massing and architecture of the buildings is supported. The Council should ensure quality detailing and materials through robust planning conditions.

- Inclusive access: A full inclusive access strategy should be conditioned.

- Climate change: Further information on overheating should be provided. The
shortfall in carbon savings should be met off-site and this should be confirmed by the applicant and Council. A sustainable drainage strategy should be secured via condition.

Response: an Overheating Assessment Report provides evidence of how London Plan 5.9 has been assessed and demonstrates how the risks of overheating have been mitigated and the cooling demand minimised. The hot water generated by the CHP will serve all parts of the residential and non-domestic building uses. Following a review of the Target Emissions Rate (TER) figures, the residential and non-residential overall CO₂ savings for the development are 36.1% and 37.7% respectively and consequently there will be no shortfall in carbon dioxide emissions required to be met off site.

- **Transport:** The scheme is compliant with London Plan standards on car parking and cycle parking. Further details should be provided including details of how the safety of pedestrians will be secured within the shared surface north-south route. A package of public realm improvements should be secured.

Response: the shared surface approach that has been adopted is entirely appropriate for this no-through road, lightly trafficked environment. Delineation and segregation is likely to encourage driver behaviour that is seeking to be eliminated by the design. It should be noted that a 1.15m wide zone delineated by a 300mm wide flush conservation kerb will be provided in any event for use by pedestrians. This would meet the requirements for even the most vulnerable pedestrians as set out in Manuel for Streets (2007).

### 5.3 Transport for London (TfL)

Has provided the following comments:

- **Access:** Autotracking has been supplied and there is no objection to the access positions. Proposals to re-open the long-dormant rear access are welcomed, albeit there are some reservations detailed below about the new internal route’s width and shared surface design. As the entrance is intended to be shared with access to two car club spaces, taxis dropping people off and small delivery vehicles, as well as exiting residents’ cars, delineation or preferably physical separation of vehicles from pedestrians and cyclists is recommended.

- **Servicing:** The percentage of HGVs anticipated to be generated by the site has reasonably been assumed to be 7%, equating to 3-4 movements a day. Swept path analysis has been successfully undertaken so as to demonstrate that the bus garage can continue to operate in its current arrangement under the proposed highway works. The servicing hours suggested are insufficiently restricted as they include peak traffic and bus use hours. Arrangements to improve the small wedge of land at the boundary between the site and bus garage would be beneficial to pedestrian amenity and the quality of the public realm. Whilst in practice the restriction on the size of delivery vehicle by condition will be difficult to enforce, use of this condition may give added weight to the objections of the Servicing Management Plan and may serve as a reminder of the importance of vigilant servicing management to future owners of the site.

- **Parking:** the low residential parking ratio (0.14) is supported in view of the excellent public transport accessibility and the lighter highway and bus
operations impacts in comparison with previous proposals for the site (in particular the supermarket). The short-stay visitor’s spaces are not strictly necessary but are more likely to be used for dropping off and picking up which is acceptable and will keep such activities off the busy public highway. Provision of two car club spaces is welcomed.

- **Trip rate & mode share**: the trip generation data and modal split scenarios data are acceptably robust for all land uses proposed.

- **Public transport**: the proposals represent a benefit to cycling and the encouragement of safe and attractive use of this popular and sustainable mode. Concern that the progression of the design for London Road must not affect the safe and efficient turning in and out of the bus station and bus reliability. The priority is to maintain the capacity of the existing stops and stands. Bus stop upgrades are likely to be required to the shelters either side of the road by the site frontage. With the high number of buses per hour serving the site, it is unlikely that a development of this size, based on the tip data, will require bus service capacity mitigation or station improvements.

- **Pedestrians**: welcome the principle of opening up the site as a through-route for the public, but the space devoted to this does not have all the characteristics of a welcoming public space for the predominant use of pedestrians. The magnitude of use by pedestrians, cyclists and exiting/manoeuvring cars will be greater than that typically experienced in a traditional mews and for this reason the new route should be widened. A clear delineation for pedestrians should be provided and should not take pedestrians adjacent to the parked and reversing mews house and car club spaces. Additional signage would be required throughout the site, in particular noting the delivery vehicles emerging from the internal road from the east. The PERs audit is supported and such improvements highlighted in the recommendations should be secured by the Council for inclusion in the highway improvements package. In addition, funding towards signposting, in the Legible London style, should be provided.

- **Cycling**: the minimum London Plan standards have been met, with 473 residential secure cycle parking spaces in various locations throughout the development, and a further 60 stands for visitors, employees and customers of the non-residential floorspace. Clarification is sought as to whether the non-residential spaces are covered and in a convenient and overlooked location. Furthermore, shower and locker facilities are required to be provided for the commercial unit(s). The proposed double-stacking system should be mechanically or pneumatically assisted and allow for double-locking. Minimum aisle widths must be met and 5% of stands should be able to accommodate larger cycles. These details should be secured by condition prior to the implementation of the scheme. The CERs audit is supported.

- **Travel Planning and Construction**: The framework travel plans (residential and commercial) have passed the ATTrBuTE assessment. These should be revisited prior to the scheme implementation and secured. The Construction Logistics Plan should be secured by condition to be submitted in detail prior to implementation.

*Response: the shared surface approach that has been adopted is entirely appropriate for this no-through road, lightly trafficked environment.*
Delineation and segregation is likely to encourage driver behaviour that is seeking to be eliminated by the design. It should be noted that a 1.15m wide zone delineated by a 300mm wide flush conservation kerb will be provided in any event for use by pedestrians. This would meet the requirements for even the most vulnerable pedestrians as set out in Manuel for Streets (2007). Electric vehicle charging points, shower and locker facilities for staff, and other technical plans (i.e. travel plan, delivery and servicing plan, construction management plan and construction logistics plan) can be secured by condition or within a Section 106 agreement. Highways improvement works would be secured by condition/Section 106 as S.278 agreement whilst the northern access will remain open at all times.

5.4 **Environment Agency**: no objection

5.5 **Heathrow Airport**: no safeguarding objections to the proposed development subject to safeguarding conditions.

5.6 **Historic England (Archaeology)**: following archaeological evaluation on site no further assessment or conditions are required. No objection to the proposals.

5.7 **Thames Water**: no objection to the proposal subject to inclusion of safeguarding conditions.

5.8 Since the proposal is for a major development, the application has been drawn to Members' attention on the weekly pending decision list dated 9th-16th September 2016 (Week 36).

5.9 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 as 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 development

7.1 At the heart of the National Planning Policy Framework (NPPF) is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision taking (Para 14).

7.2 The NPPF emphasises meeting local needs through providing high quality community services and good design, while protecting the local environment. It seeks to protect open space, with reference to specific local need and taking account of replacement or mitigation measures.

7.1 Policy IMP1 (Sustainable development) of the adopted Local Plan states that the Council “will take a plan-led approach to all growth and development within the Borough that is considered to be in accordance with the principles of sustainable development as set out in the NPPF, with a balance of social, environmental and economic dimensions”. This policy re-iterates the presumption in favour of sustainable development established in the NPPF.

7.2 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.

7.3 In the adopted Local Plan, the application site is allocated (Site Reference 38) for ‘Mixed use: Residential and retail’. The mixed use allocation is based on a floorspace ratio of 50:50 residential to retail use based on the identification of a development opportunity in the Hounslow Town Centre Masterplan and the existence of an extant planning permission for a 5,350sqm convenience retail store. The site assessment recognises constraints to potential development of the site, its location within the Hounslow town centre boundary, an
Archaeological Priority Area and an LEW Noise Contour and the consideration of the need to retain or re-provide town centre car parking on this site.

7.4 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 within the Masterplan as Opportunity Site 21 (Hounslow House). 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.

7.5 The Masterplan identifies the site as being able to deliver a high quality and vibrant area within the ‘Kingsley Quarter’ which contributes towards the delivery of improved local services.

7.6 The site does not currently provide any town centre car parking, nor did it in its previous use. While the allocation in the adopted Local Plan highlights the potential need to retain or re-provide town centre car parking on this site, there would be sufficient capacity elsewhere within Hounslow Town Centre to negate the need for its retention or re-provision (discussed in more detail in the Transport section of this report below).

7.7 The proposals would be in accordance with both the Local Plan allocation and Town Centre Masterplan for the site and as such it is considered that the proposal is acceptable in principle and in accordance with adopted policies; it would re-use a brownfield site, providing new residential development that would contribute towards the improvement of the vitality and viability of the town centre through the provision of high quality accommodation that would help delivery much need housing for the Borough and flexible commercial space that would provide a secondary offer to the main High Street. Whilst the retail floorspace would be less than that identified in the site allocation (just 13%), given the site’s location at the eastern extremity of the town centre, it is not considered that this would be an appropriate location for a large area of commercial floorspace and should be seen in the context of the delivery of a new commercial centre for Hounslow through the delivery of the High Street Quarter development. 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.

7.8 The other main planning issues to consider are:

- Urban Design;
- Residential Quality: Density, Mix, Tenure, Standards & Amenity Space
- The impact on neighbouring land uses;
- Highways, Transport and Access;
- Energy and Sustainability; and
Other environmental considerations

Urban Design

Context

7.9 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.

7.10 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).

7.11 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.

7.12 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.

7.13 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.

7.14 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 (being substantially taller than its surroundings).

7.15 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.”

7.16 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”.

7.17 The Urban Context and Character Study identifies and analyses the urban character 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 character in ways which enhance positive qualities and address negative issues.

7.18 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 tallest part of the development is over 21m it would constitute a tall building in terms of the Study and Local Plan.

7.19 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”.

Layout, height and massing
7.22 The proposed site layout has been designed around the key feature of a north-south route through the site to link London Road with the footpath to the north. This will assist greatly with permeability at this end of the town centre and provide a safe, convenient link between Hounslow East Underground station and London Road, removing the need to negotiate around the bus garage on the corner of London Road and Kingsley Road. The schemes layout will provide surveillance to this route, including the northern connection with the existing footpath to ensure it is safe and secure for general public use. Furthermore, the layout has sought to respond to the sensitive eastern boundary to minimise the impact on existing residential properties that back directly on the site, ensuring there would be no direct overlooking or significant overshadowing of properties or garden areas.

7.23 They way in which the development has been set out will ensure such routes through the site are attractive to use for both residents and the wider public, with clear distinctions between public and private spaces assisting legibility (i.e. the enclosed private, communal courtyard and the main access route through the site). Active frontages to routes through and around the site have been provided where possible giving animation and activity to these routes. Elsewhere other entrances, such as those to the communal courtyard, are marked with double height accesses, which will provide an attractive route for residents, but also allow glimpses of the landscaping within for passers-by, helping to break up these frontages and provide a sense of relief at street level.

7.24 A key component of the site layout was to ensure that the adjacent bus garage site, which is allocated for future development potential in the Local Plan, is not sterilised. As such, a conceptual Masterplan has been created which takes into account the future development potential of the neighbouring site and demonstrates how future development would respond to the current proposals. An extract of this is provided below:
Finally the site provides an active frontage onto London Road that will repair this side of the street and provide a strong building line. The position of this ‘public-facing’ block has been set-back to allow provision for generous footpaths as well as potential cycle improvement works along the High Street/London Road. The entrance to the site is celebrated with landscaping and public realm enhancements coming to the front corner of the site, drawing passers-by into the site both visually and physically. It is considered that such an arrangement will help to form an important gateway into the site, but its success will be in the detailed landscape design to ensure routes of movement into the site are clear, legible and accessible.

The following extract from the Design & Access Statement demonstrates how the site coverage has evolved from the previous buildings, through the extant permission and the refused scheme to the current proposals. It is considered that this site arrangement is a significant improvement and will help create a high quality, legible development with significant public realm improvements at both ends of the site that will help knit the development into the existing townscape.

Building heights have been strongly influenced by the need to minimise the impact on neighbouring residential properties. As a consequence of early daylight/sunlight modelling, the height was positioned towards the western site boundary where any proposals would be less likely to affect adjoining properties. With the site being located within the town centre boundary, a ‘tall’ building is considered to be appropriate and can help create a visual signpost, which in this instance will help mark the junction of London Road and Kingsley Road. As such, it is considered that at 11 storeys the height of the development is appropriate to this site and surrounding setting, noting in particular other tall buildings positioned on the High Street/London Road in close proximity to the site. Furthermore, the height has been articulated through considered design, is not in the form of an overbearing or dominant ‘tower’ element and forms part of a wider design ethos that ensures it is seen within the wider collective of building forms proposed on the site. Such an arrangement will ensure that this tallest element would not appear unduly prominent in the street scene, whilst the height of the building fronting London Road (at seven storeys) would be comparable to Aces Court to the east and form an appropriate transition at this end of the town centre.
The variations in height across the site, from two to 11 storeys would assist with breaking down the massing across the site as a whole, responding to the wider context of the town centre as well as providing other benefits (i.e. minimising impact on neighbouring properties and ensuring a high quality of residential accommodation). This would also ensure that the built form did not appear as an overdevelopment of the site, in particular around the public routes through the site where building heights are generally lower giving a greater sense of openness and appropriate scale to ensure these routes are attractive.

What could otherwise appear as quite a bulky and massive development has been intelligently broken down into distinct elements through materiality and façade treatment. Set-backs at upper levels and breaks in the building line serve to break up the development into individual blocks, whilst the fenestration and balcony detailing further helps to reduce the overall massing. Such a treatment is considered to help integrate the development into the surrounding context and ensure it would not appear as an unduly prominent or bulky development in the street scene or wider context of the area.

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

Architecture

The development proposals consists of five elements; Blocks D & E, which front onto London Road, Block A, which is the tallest element adjacent to the bus garage, Blocks B & C, which help complete the South Block and frame the entrance to the site, Blocks F-J, which form the North Block and provide the frontage to the north-south route and the Mews Houses which are positioned along the eastern boundary.
**Blocks D & E**

7.32 This block has been designed as the main public face of the development and has been designed to read as a series of horizontal bands alternating contrasting colours, with a light vertical stacked brick/tile against a dark horizontal stacked tile. The dark bands have provided the opportunity to integrate fenestration and balconies/winter gardens onto this elevation so that they appear integrated into the building rather than appearing as ‘pop-out’ additions.

**Block A**

7.33 This block has been articulated into three forms to create a more vertical proportion, distinct from other blocks in the proposals. However, the horizontal proportions of the rest of this courtyard block have been integrated to ensure that this block does not appear as an isolated, alien feature when viewed as a collective. Recessed balconies and changes in materiality at the upper level (glazed ceramic tiles have been proposed) help articulate the three forms.

**Blocks B & C**

7.34 These blocks continue the horizontal proportions and pattern of Blocks D & E but propose a subtler change in brick tone and projecting balcony details to give a more domestic feel, away from the London Road frontage. Gaps between these blocks provide views into the landscaped courtyard as well as helping to break up the massing of this courtyard building. This block also incorporates a double-height glazed entrance foyer which incorporates patterned metal railing found elsewhere around these blocks.

**Blocks F-J**

7.35 These blocks use continuous horizontal bands of vertical brick slips to match the proportions of Blocks D & E but using a palette of materials that more closely reflects the domesticity of Blocks B & S. Windows and the inside faces of inset balconies are clad in a light enamel finished metal panel. Curved corners are used on the key junctions, providing a high quality finish to these highly visible junctions. Residential entrances will be highlighted by curved glazed brickwork in bright colours to provide legibility.

**Mews Houses**

7.36 These are arranged along the eastern boundary linked at ground floor only. A zinc hipped roof has been shaped to maximise daylight/sunlight into habitable rooms and terraces, and also to maintain adjoining residents’ amenity. Brick detailing is proposed to highlight entrances and echoes similar detailing used on the other blocks.

7.37 It is considered that the architectural features of each of these blocks will ensure a high quality finish to the development that assists with legibility and articulation but also provides a sense of collective between the various elements. A familiar palette of tones/colours is proposed with materials that will be used across the site (brick slips and/or glazed tiles).

7.38 Fenestration and balcony arrangements have been designed to respond to each block, further reinforcing a sense of identity within the development with different patterns to the balcony balustrades and a combination of projecting and inset...
balconies to respond to the different context (e.g. inset balconies are proposed on the London Road frontage but also on the eastern façade of Blocks F-J to minimise overlooking of properties fronting North Drive). Other key elements, such as entrances to cores, will be highlighted with textured brickwork, glazed entrances or bright colours. The use of these architectural features to help break up the scale and mass of the development, create interest and identity is welcomed and the success of this approach will be in the final detail design.

7.39 It is therefore considered that the architectural approach across the development would ensure a high quality finish that worked to break up the scale and mass of the new buildings but also gives a sense of identity and legibility. The proposed materiality, which shares elements across the development, ensures consistency of appearance and uniformity that responds to the local vernacular. The success of this approach will be dependent upon the final design detail and materials, which will be secured by condition to ensure a high standard of finish. As such the proposals are considered to be in accordance with the Local Plan and London Plan.

**Landscaping**

7.40 The open space strategy has sought to prioritise pedestrian and cycle movement through the site and provides a mix of private open spaces for residents and more public spaces associated with the main public routes. Key features of the landscape include:

- Private podium courtyard garden for residents;
- Private residents’ garden at grade including integrated play space;
- Shared surface lanes delineating main pedestrian and cycle routes through the site;
- Enhancements to public footpath and open, attractive link at northern end of the site;
- Carefully managed vehicle access; and
- Private gardens/balconies/winter gardens for residents.

7.41 One of the key principles for the development is ensuring that the route through the site between London Road and the public footpath provides a safe, attractive environment for residents and the wider public. Careful consideration has been given to both the design of this route, but also the connections at either end, ensuring these provide an open and attractive space that serves to draw people into the site. The landscaping proposals demonstrate how this can be achieved through a range of hard and soft landscaping, including the provision of new specimen tree planting to give character and shape to these spaces. The use of street furniture will be important at these junctions, ensuring the routes remain clear and accessible but also placed to minimise conflict with motorised vehicles and prevent access to these.

7.42 The range of planting across the site is considered appropriate for this development, providing the necessary greening that would otherwise be dominated by hardstanding. The treatment of building edges to ensure privacy is
maintained for residents has been successfully proposed to provide a balance between passive surveillance from these properties and privacy for residents.

7.43 Consideration has also been given to how vehicles will manoeuvre within the site and the potential conflicts that can arise between such movements and pedestrians/cyclists, as well as the impact these movements can have on planting adjacent to these areas. It is reassuring that a robust strategy has been proposed to minimise these conflicts and ensure a high design quality once the site becomes operational and subject to these vehicle movements in particular.

7.44 It is considered that the proposed landscaping across the development will complement the architectural form of the development, providing visual softening where appropriate and adding interest and identity across the site. As such is it considered the proposed landscaping would ensure a high quality finish to the development, albeit the details of the finished arrangements would need to be secured by condition. The proposals are therefore considered to be in accordance with the adopted Local Plan and London Plan.

Summary

7.45 In summary, it is considered that the development would deliver a high quality scheme, as envisaged by the Hounslow Town Centre Masterplan, which ensures the provision of a high quality residential development that would respond to and reflect the local context and character of the area. Despite the relatively large scale and significant increase in the quantum of development across the site, it is considered that the form and massing of the proposals respond to the site’s location in the town centre, and that through a number of means of articulation, the scale has responded to sensitive boundaries to minimise the impact on existing streetscapes. Furthermore, the height of the development is considered appropriate to this site. The landscaping would combine well with the architectural detailing, bringing together a scheme of the highest quality which is considered to be in accordance with the NPPF, the London Plan and the adopted Local Plan as identified above.

Residential Quality: Density, Mix, Tenure, Standards & Amenity Space

Density

7.46 London Plan policy 3.4 (Optimising Housing Potential) sets out a density matrix at Table 3.2. Within this, the application site falls between the definitions of an ‘Urban’ and ‘Central’ area, with terraced housing and buildings of medium footprint prominent but noting its location within a Metropolitan town centre. As such a density in the ‘Urban’ range is considered most appropriate for this site, responding to the local context of the site, and as such densities of 45-260 units per hectare, or 200-700 habitable rooms per hectare, are appropriate for sites with a PTAL (public Transport Accessibility Level) of 4-6.

7.47 Adopted Local Plan policy SC4 (Scale and Design of New Housing Development) seeks new development to balance the need to make efficient use of land and achieve high quality design and accessibility, whilst respecting and responding to local context and character, and protecting existing residents’ amenity. It states that the density ranges contained within London Plan policy 3.4 will be used to help guide the design and scale of new housing developments, but that the Council would expect developments to adopt a more sophisticated
approach that is responsive to the context and character of the site and its setting.

7.48 The proposed residential density is 250 units/hectare (or 653 habitable rooms/hectare), which is within the optimum range and therefore considered acceptable.

Mix & internal space standards

7.49 The proposed accommodation mix is set out as follows:

<table>
<thead>
<tr>
<th>Unit type</th>
<th>Number</th>
<th>Private Sale</th>
<th>Shared Ownership</th>
<th>Affordable Rent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Studio</td>
<td>23 (8%)</td>
<td>23</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>1B2P</td>
<td>94 (32%)</td>
<td>87</td>
<td>6</td>
<td>1</td>
</tr>
<tr>
<td>2B3P</td>
<td>38 (13%)</td>
<td>31</td>
<td>3</td>
<td>4</td>
</tr>
<tr>
<td>2B4P</td>
<td>111 (38%)</td>
<td>95</td>
<td>10</td>
<td>6</td>
</tr>
<tr>
<td>3B</td>
<td>27 (9%)</td>
<td>19</td>
<td>0</td>
<td>8</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>293</strong></td>
<td><strong>255 (87%)</strong></td>
<td><strong>19 (6.5%)</strong></td>
<td><strong>19 (6.5%)</strong></td>
</tr>
</tbody>
</table>

7.50 The NPPF and the London Plan encourage new residential developments to provide a choice of housing with a mix of family and non-family housing needed to meet different community requirements. In addition to this need for housing mix, developments over 10 dwellings should include a proportion of affordable homes as required by London Plan Policy 3.13.

7.51 London Plan Policy 3.8, together with the Mayor’s Housing SPG, seeks to promote housing choice and a balanced mix of unit sizes in new development, with particular focus on affordable family homes. Table 3.3 sets minimum space standards for dwellings of different sizes. This is based on the minimum gross internal floor area (GIA) required for new homes relative to the number of occupants, whilst also taking account of commonly required furniture and spaces needed for different activities and moving around. These standards are reflected in the Local Plan policy SC5 which requires development proposals to demonstrate compliance with the Nationally Described Space Standards. All units have been designed to meet or exceed these minimum space standards.

7.52 A total of 138 residential units (47%) would have at least two bedrooms, which are considered to be family-sized units in the Local Plan, with 9% having 3+ bedrooms. The housing mix is supported as it will help contribute towards an identified Borough shortage and result in a balanced, sustainable community, which would be in keeping with its context where there is already a range of accommodation in the area, but also reflect the site’s location within the town centre where larger houses are considered less appropriate given the constraints on amenity spaces, parking, noise, air quality etc.

Daylight and sunlight
7.53 A daylight and sunlight report has been submitted in support of the proposed accommodation to demonstrate compliance with the BRE 2011 guidance for daylight and sunlight in new developments. Failure does not necessarily mean the impact would be unacceptable and the BRE requirements are advisory, and as they are used for urban and suburban areas they should be applied flexibly to take account of varying densities. The BRE guide also clearly states that it “is not mandatory and the guide should not be seen as an instrument of planning policy” and that numerical guidelines should be interpreted flexibly since natural lighting is only one of many factors in site layout design. This is reflected in adopted Local Plan policy SC4 which expect development proposals to demonstrate compliance with prevailing daylighting standards (BRE Guidance 2011).

7.54 This assessment concludes that 90% of the rooms within the scheme will achieve minimum or, in most cases, substantially better than the minimum levels of daylight. In almost all instances where rooms are falling below the minimum recommended standards this is as a result of the position of external balconies projecting above these rooms. It is noted that were no balconies proposed, 98% of all the rooms would satisfy daylight guidance.

7.55 There would be no single-aspect, north-facing dwellings; single aspect units range from 30 degrees northeast around to 30 degrees northwest, all of which would be one-bedroom units. 53% of the units would be dual aspect and all 3+ bedroom units are dual aspect. It is considered that, on the basis of the information submitted and taking into consideration the need to provide private amenity space in the form of externally projected balconies, and the layout and form of the proposed development, a satisfactory level of daylight and sunlight would generally be received by a significant majority of the new dwellings and would be broadly compliant with the BRE guidance.

Privacy and outlook

7.56 The London Plan Housing SPG recognises that older planning guidance for privacy sought to achieve visual separation between dwellings by setting minimum distances of between 18-21m between habitable rooms, with these distances being useful yardsticks for privacy. This requires each dwelling to be provided with an adequate level of privacy in relation to neighbouring property, the street and other public spaces.

7.57 The scheme has been designed to achieve the requirements of the Housing SPG in respect of separation distances ensuring residents would be afforded appropriate levels of privacy. The courtyard would measure some 34m x 2m at podium level of the South Block and whilst the gaps between the various buildings would be less than this (the closest being 6.5m) where habitable rooms face other habitable rooms across these spaces they one or other of the windows is a secondary window and as such appropriate screening could be provided to ensure residents had appropriate privacy. Such measures would be secured by condition.

7.58 In respect of the separation between the South Block and the North Block, this would be in excess of 20m whilst the arrangement between the mews houses and the North Block, at 14m is considered appropriate given the mews houses

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are all dual-aspect with multiple windows. Furthermore such relationships across streets are not uncommon and are prevalent across the Borough.

7.59 The scheme has been designed to ensure residents benefit from an appropriate outlook, in particular through the siting and layout of the individual blocks and their interrelationship, noting in particular the high level of dual-aspect units.

**Amenity space**

7.60 The provision of good quality, useable amenity space and children’s play areas is fundamental to good planning. Particular emphasis on the quality and quantity of the amenity space in developments of this size is needed to ensure adequate provision and accessibility for all residents. Such spaces should be private and secure with safe and convenient access. For flatted developments, communal areas are generally acceptable, although areas immediately adjoining flats should have private gardens/terraces for sole use of those flats.

7.61 The London Plan Housing SPG advises that a minimum of 5sqm of private amenity space should be provided for one-two person dwellings, with an extra 1sqm provided for each additional occupant. The minimum depth and width of all balconies and other private external spaces should be 1.5m. The London Plan Housing SPG seek 10sqm of dedicated play space per child, whilst also recognising that appropriate and accessible facilities within 400m for 5-11 year olds and within 800m for 12 plus age groups may be acceptable alternatives. Based on the Mayor’s ‘Assessing child occupancy and play space requirements’, the child yield expected for this proposal is 50, of which 27 would be under 5.

7.62 Local Plan Policy SC5 (Ensuring Suitable Internal and External Space) reflects the standards contained in the London Plan Housing SPG in respect of provision of private amenity space for flatted developments, but factors in a requirement to provide communal external amenity space for such developments, with the following benchmarks: 25sqm per flat with up to 3 habitable rooms; 30sqm per flat with 4 habitable rooms; and 40sqm per flat with over 5 habitable rooms (less a reduction for the area of private space provided for each flat). The quantitative space requirements will be applied with regard to exceptional design considerations.

7.63 The proposal would provide 2,641sqm of private amenity spaces for each dwelling, comprising balconies, terraces or winter gardens. These would range in size between 4.3sqm and 64.8sqm. 93% of the units meet or exceed the minimum private amenity space requirements and of the remaining, none drop lower than 1sqm below the minimum requirement. In addition to the private amenity space provision (which when taken as a whole would equate to 146% of the policy requirement), two communal courtyard gardens are proposed. These would provide an additional 2,073sqm of amenity space which would be fully accessible to all residents. The Council’s benchmark quantum requirement for communal amenity space provision for this development would be 4,818sqm (7,460sqm – 2,641sqm). There is therefore a shortfall of communal amenity space of 2,745sqm (43%).

7.64 The table below provides details of the amenity space proposed across the site:

<table>
<thead>
<tr>
<th>Amenity space type</th>
<th>Policy requirement</th>
<th>Proposed (sqm)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>(sqm)</td>
<td></td>
</tr>
<tr>
<td>--------------------------------</td>
<td>------------</td>
<td></td>
</tr>
<tr>
<td>Private/semi-private terraces/balconies</td>
<td>1,806</td>
<td></td>
</tr>
<tr>
<td></td>
<td>2,641 (146%)</td>
<td></td>
</tr>
<tr>
<td>Communal Amenity</td>
<td>4,818</td>
<td></td>
</tr>
<tr>
<td></td>
<td>2,073 (43%)</td>
<td></td>
</tr>
<tr>
<td>Play space</td>
<td>270 (GLA benchmark)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>400 (148%)</td>
<td></td>
</tr>
</tbody>
</table>

7.65 Door step play space (under 5’s) would be incorporated into both of the landscaped courtyards, which would be accessible for all residents. This would equate to 400sqm of play provision on site within the wider landscape strategy. The details of the exact provision, including layout and facilities would be secured by condition, however, the principle of the quantum of play space is considered acceptable and in accordance with the London Plan Housing SPG. There would not be any provision for older children on site and currently there is no provision within 400m of the site, although it is noted that Inwood Park is accessible via a public footpath to the south (albeit across London Road) and Kingswood recreation ground is approximately 450m to the north.

7.66 As can be seen from the table above, there would be significant under-provision of communal amenity space across the site, albeit partially off-set by the over-provision of private amenity areas. The proposed communal amenity spaces would be centrally located within the development and accessible to all residents, providing an attractive, usable space for residents that would receive good amounts of daylight with high levels of overlooking to ensure these would be safe and attractive places to use. Details of the finished arrangements would be secured by condition, ensuring there would be a range of landscaped features (seating, planting, play areas, grass, etc.).

7.67 Generally it is considered that the landscaping scheme would provide an attractive setting to the development and a pleasant environment for future residents to relax in and enjoy. Whilst the provision would be below the benchmarks contained within the adopted Local Plan for communal amenity areas, given the location of the development within the town centre and the high quality spaces being provided, such an under-provision is not considered to be unacceptable in this instance. It should also be noted that this standard is a borough-wide benchmark and as such it would be reasonable to expect greater flexibility in town centre locations where it can be impractical to make a higher provision on site (e.g. greater levels of overshadowing, exposure to noise, etc.).

**Internal noise environment**

7.68 The NPPF replaced the Planning Policy Guidance that previously covered planning and pollution control and new development in England. This removed the categorisation of sites within Noise Exposure Categories, with reference directed towards the Noise Policy Statement for England² and for decisions to aim to avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development and to mitigate and minimise other adverse impacts, including by use of conditions.

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² Developed by DEFRA and published in March 2010
London Plan policy 7.15 (reducing Noise and Enhancing Soundscapes), along with adopted Local Plan Policy EQ5 (Noise) seek to ensure that the location and design of new development has considered the impact of noise, and mitigation of these impacts, on new uses and surrounding uses according to their sensitivity.

Alongside this, BS:8233 (Sound Insulation and Noise Reduction for Buildings – Code of Practice) has a number of design criteria and limits for intrusive external noise. The most relevant of these for residential environments are reproduced below:

<table>
<thead>
<tr>
<th>Activities</th>
<th>Location</th>
<th>Daytime (07:00-23:00)</th>
<th>Night-time (23:00-07:00)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Resting</td>
<td>Living rooms</td>
<td>35dB</td>
<td>-</td>
</tr>
<tr>
<td>Dining</td>
<td>Dining room/area</td>
<td>40dB</td>
<td>-</td>
</tr>
<tr>
<td>Sleeping (daytime resting)</td>
<td>Bedroom</td>
<td>35dB</td>
<td>30dB</td>
</tr>
<tr>
<td>-</td>
<td>Outdoor amenity spaces</td>
<td></td>
<td>55dB</td>
</tr>
</tbody>
</table>

BS:8233 acknowledges that these guidelines may not be achievable in higher noise areas such as city centres or urban areas adjoining the strategic transport network and that in such situations developments should aim to achieve the lowest practicable noise levels in outdoor amenity areas.

A Noise Assessment has been submitted with the application. It identifies the main source of noise affecting the site from overhead aircraft and road traffic. This assessment concludes that the site would not be unsuitable for residential development based on noise and that the noise predictions indicate that suitable internal noise levels could be achieved through the implementation of appropriate glazing and integrated ventilation systems, either passive or mechanical. However, noise levels within external amenity areas would be above the 55dB recommendation owing to aircraft noise. Given the site's location, it is not considered that there would be an appropriate form of mitigation to achieve these standards.

Details of how these standards would be achieved can be secured by condition because the report did not indicate that the site is presently exposed to high levels of noise that would prevent residential accommodation being appropriate.

Accessibility

The London Plan strongly supports the principles of Lifetime Homes and views them as fundamental to delivery of the Government’s objectives of social inclusion, sustainability, equality and valuing diversity and identifies that the increased independent living they can bring will reduce pressure on hospital beds and residential care homes. The Minor Alterations to the London Plan state that 90% of new housing should meet Building Regulations requirements M4(2) ‘accessible adaptable dwellings’ with 10% meeting M4(3) ‘wheelchair user dwellings’ and should be designed to be wheelchair accessible or easily adaptable. This replaces Lifetime Homes Standards.

Local Plan Policy CC2 states that developments should be designed to be fully
accessible to people with disabilities or impaired mobility.

7.76 Detailed plans have been provided to indicate that 29 of the proposed dwellings (10%) would be wheelchair accessible or easily adaptable, meeting Building Regulations Part M4(3): (Wheelchair User Dwellings). Provision of these standards within the initial design is welcomed, and can be secured by condition. The remaining 90% would comply with Part M4(2): (Accessible and Adaptable Dwellings).

**Waste and recycling**

7.77 The London Plan outlines the Mayor’s commitment to making better use of waste and its management. It emphasises the importance of four policies in relation to waste management: 5.3 (Sustainable Design and Construction), 5.16 (Waste self-sufficiency), 5.17 (Waste capacity) and 5.18 (Construction, Excavation and Demolition Waste).

7.78 Adopted Local Plan policy EQ7 (Sustainable Waste Management) states that the Council will be working with the West London Waste Authority boroughs to meet its waste apportionment, whilst promoting the prevention, re-use, recycling and recovery of waste, consistent with the waste hierarchy.

7.79 The residential waste generated by the development would be managed by the Council’s existing waste management contracts and use the standard containers. The proposals include integrated storage areas for refuse/recycling waste within each of the residential cores, with the mews houses benefitting from separate storage areas within their front gardens. The details of this provision would be secured by condition but it is considered that the principle of the waste and recycling strategy for the development is acceptable and in accordance with the relevant Development Plan policies.

**Affordable housing supply**

7.80 Government policy in the NPPF, supported by the London Plan, requires all housing developments in the Borough capable of providing ten or more dwellings to provide on-site affordable housing. The current demand for affordable housing is spread over a variety of types. The London Plan Housing SPG (2015) defines affordable housing as including social rented and intermediate housing, provided to specified eligible households whose needs are not met by the market. This is also reflected in emerging Local Plan policy SC2.

7.81 In April 2011 the Government introduced a new affordable rent product, intended to meet the same housing need as social rent. It is intended to allow affordable homes to be made available to tenants at up to a maximum of 80% of the gross market rent (taking account of the service charge for that property, where applicable) and allocated in the same way as social housing. The London Plan Housing SPG (2015) advises Boroughs that, rather than using the definitions from London Plan paragraph 3.11, in order to conform with the NPPF this definition of affordable rented housing should be used alongside more established definitions of social rented housing and intermediate housing, with all three products falling within a general affordable housing definition.

7.82 London Plan Policy 3.12 also states that, in negotiating affordable housing in private schemes, Boroughs should seek the maximum reasonable amount of
affordable housing having regard to their affordable housing targets, the need to encourage rather than restrain residential development and the individual site circumstances. Local Plan Policy SC2 sets a target for 40% of on-site delivery of affordable housing at a tenure split of 60% affordable/social rent and 40% intermediate, as reflected in London Plan policy 3.11. This policy also states that when financial viability assessments demonstrate that current market conditions will support less than 40% affordable housing, a review mechanism upon partial or full completion of a development will be employed.

7.83 The development would provide 38 dwellings within the London Plan and the adopted London Plan Housing SPG (2012) definitions of affordable housing. This equates to 13% of the accommodation being affordable housing by unit (or 15% by total habitable rooms). This tenure split is shown below:

<table>
<thead>
<tr>
<th>Tenure</th>
<th>No. units</th>
<th>% of mix</th>
</tr>
</thead>
<tbody>
<tr>
<td>Affordable rent</td>
<td>19</td>
<td>6.5%</td>
</tr>
<tr>
<td>Shared-ownership</td>
<td>19</td>
<td>6.5%</td>
</tr>
<tr>
<td>Private sale</td>
<td>255</td>
<td>87%</td>
</tr>
<tr>
<td><strong>Affordable Housing content</strong></td>
<td><strong>38</strong></td>
<td><strong>13%</strong></td>
</tr>
</tbody>
</table>

7.84 The applicant has indicated that they expect to sell the affordable housing element of the scheme to a Housing Association to manage over the lifetime of the development, although a prospective purchaser has not yet been identified. The location of the affordable housing units in separate cores should prove attractive to potential Housing Associations in terms of management, security and costs.

7.85 A financial viability assessment was submitted to justify the level of affordable housing being proposed. An independent assessor has confirmed that the financial viability assessment is acceptable and provides sufficient information and evidence that shows that it would not be viable for the developer to provide any more affordable housing than has been offered. This is primarily as a result of the benchmark land value being attributed to the extant planning permission for a food store, the build costs associated with the development and the anticipated value of private sale units. A review mechanism would be secured through the S106 to capture any uplift in viability with a profit share arrangement between the Council and developer in order to deliver a financial contribution towards off-site provision. The principle of this review mechanism has been agreed with the developer.

7.86 The Council would look to secure 100% nomination rights to the affordable rent flats within the Section 106 legal agreement, meaning that occupants of these units would already be on the Council’s Housing Register.

7.87 Following discussions with the Council’s Affordable Housing Supply team, the proposed amount and mix of affordable housing is welcomed and would help meet identified need and give quality housing choice in a sustainable location. Although the tenure split between affordable rent and shared ownership is skewed in favour of the latter, in this instance, given the location of these cores, it is not considered inappropriate in this instance and will ensure the delivery of the maximum, reasonable level of affordable housing on the site. Therefore, the
development would make a significant contribution towards affordable housing in
the Borough, helping to meet the London Plan and adopted Local Plan priorities.

7.88 It is therefore considered that the proposal would be in accordance with the
housing policies identified above and would provide a high standard of
accommodation for future residents whilst delivering a significant level of
affordable housing on site.

**Impact on neighbouring land uses**

**Daylight, sunlight and overshadowing**

7.89 London Plan policy 7.6 states that buildings and structures should not cause
unacceptable harm to the amenity of surrounding land and buildings, particularly
residential buildings, in relation to privacy, overshadowing, wind and
microclimate.

7.90 Local Plan policy SC4 states that development proposals should demonstrate
compliance with prevailing day-lighting standards (BRE Guidance 2011). Policy
CC2 seeks to protect existing residents’ amenity.

7.91 A Daylight & Sunlight Assessment has been submitted with the application which
assesses the impact of the proposal on neighbouring residential properties in
terms of daylight, sunlight and overshadowing. The 2011 BRE Handbook states
“Adverse impacts occur when there is a significant decrease in the amount of
skylight and sunlight reaching an existing building where it is required, or in the
amount of sunlight reaching an open space. The assessment of impact will
depend on a combination of factors, and there is no simple rule of thumb that can
be applied”. Where the BRE guidance tests are not met, a major adverse impact is likely where:

- A large number of windows are affected;
- The loss of light is substantially outside the guidelines;
- All windows of a property are affected;
- The nature of the room affected is on where the need for light is high (e.g. living room), with the guidance stating bedrooms are less important.

7.92 In view of the above, the interpretation of the daylight and sunlight results must
be assessed in terms of the quantum of light loss of gained, not purely on the
percentage of change. The percentage value may well be misleading, particularly
where baseline values are large. In these situations, a small change in the
quantum of light could represent a high percentage change in the overall figure,
implying that there would be a significant change whereas in reality the different
may be negligible.

7.93 The assessment submitted concludes that the majority of rooms within the North
Drive properties and the London Road/High Street properties are either entirely
unaffected or are BRE compliant or, in a few isolated cases, only slightly breach
BRE guidance, but generally retain good levels of daylight and sunlight amenity.

**North Drive**

7.94 Three properties will experience breaches of sunlight guidance; 22, 6 and 2.
- No. 22 has one window which will exceed the recommended alteration in winter sunlight. This is considered to be a minor breach in sunlight guidance and the window and room will continue to be well lit.

- No. 6 has one ground floor room served by nine separate windows, two of which exceed the BRE recommendations in winter sunlight, but all other windows serving the room remain well sunlit. This is considered to be acceptable since the room will continue to be well lit.

- No. 2 has three windows serving three separate rooms which will breach the BRE recommended sunlight, however in all three cases the rooms in question have other windows which will satisfy the BRE sunlight guidance. This is considered to be acceptable since the rooms will continue to receive adequate light from other windows.

Aces Court

7.95 Of the windows assessed, 29 will see an improvement in their sunlight amenity as a result of the proposed development in comparison to that previous experienced with the former Hounslow House in situ. 94 windows are either unaffected or meet the BRE recommended guidelines. 13 windows which serve 11 rooms exceed recommended sunlight changes. 10 of the windows retain 20% or more annual APSH (against a target of 25%), which is considered to be good for an urban environment such as this. The 11th window serves a room which has a second very well lit window. The final two windows are recessed, on the ground floor and beneath a continuous balcony, one of which is a bedroom and the other a living room. These retain 4% and 11% annual APSH respectively.

7.96 In relation to Aces Court, it is clear that the design of the building itself and its proximity to the site boundary creates a burden on the ability to achieve compliance. The combination of deep rooms within Aces Court, and in many instances balconies oversailing rooms beneath suppress sky visibility which means that many rooms are dependent upon light across the application site at a very shallow angle. However, as a result of the design development of the scheme, many rooms see an improvement in their daylight and sunlight amenity, the vast majority are either unchanged or satisfy BRE recommendations in terms of permissible and unnoticeable alterations. Where there are breaches of the guidance, further analysis demonstrated that the actual alteration in terms of the depth to which light can penetrate into the room is barely altered.

7.97 Furthermore, a technical analysis without balconies on Aces Court confirms that almost all windows would meet the BRE’s VSC daylight test, confirming that the scale of development proposed would not have an unacceptable impact on residents’ amenity.

7.98 A technical analysis was undertaken to determine the extent to which the proposal affects the sun on ground which will be experienced by neighbouring gardens and amenity spaces. This found that all analysed areas continued good and compliant BRE levels of sun on ground.
7.99 The assessment indicates that whilst some areas will be in shadow for parts of the day, none of the surrounding properties would be subjected to prolonged overshadowing as a result of the development. As such it is not considered that the proposal would result in an unacceptable level of overshadowing of surrounding properties and would be broadly in compliance with the BRE Guidelines and adopted policy.

7.100 It is therefore considered that whilst the proposal would result in a loss of daylight/sunlight to neighbouring windows and amenity areas, this would largely be within the BRE recommendations and where exceedances occur these are generally in isolated situations that reflect the existing building design (e.g. Aces Court). It is considered that the impact on residents’ amenity in terms of daylight/sunlight is acceptable, taking into consideration all other factors including the regeneration of this site and the delivery of much needed housing.

Overlooking

7.101 The only residential properties are to the east of the site; fronting North Drive or within the Aces Court development. Careful consideration has been given to the design and layout of the proposed development to minimise the potential for overlooking of these neighbouring properties and associated amenity spaces. In
particular it is noted that the design of the mews houses that form the eastern boundary of the site would retain the existing boundary wall with windows on the southern and western elevation, ensuring there would be no direct overlooking from these properties to North Drive or Aces Court. Where there would be first floor terraces, these would be screens to prevent overlooking and would be secured by condition. Elsewhere, blocks are positioned a significant distance from the boundary (in excess of 20m) and whilst there would be balconies at upper levels, it is not considered that these would give rise to an unacceptable loss of privacy for existing residents.

Outlook

7.102 The design and external appearance of the proposed development has been assessed in detail in the preceding section on Design and Appearance.

7.103 Whilst properties that surround the application at present generally enjoy an open outlook since the site has been cleared, it is not considered that it is of particularly high value, nor representative of this town centre location.

7.104 The proposed development has been sited to minimise the impact on neighbouring residents in terms of outlook. As indicated above, there would generally be substantial separation distances between surrounding residential properties (with the exception of the low-rise mews houses), ensuring these properties would continue to have a satisfactory outlook. Furthermore the massing of the development has been broken up with various set-ins and steps in building line, as well as the use of varying materials and other features such as balconies, to ensure the development would not result in a monolithic, overbearing feature from the surrounding properties.

7.105 The proposals would also introduce areas of landscaping across the site, which would help to soften the visual appearance of the development from the surrounding properties.

Noise and general disturbance

7.106 Policy 7.15 of the London Plan states that development proposals should seek to reduce noise maximising the existing and potential adverse impacts of noise on, from, within, or in the vicinity of, development proposals.

7.107 Policy EQ5 of the adopted Local Plan states that the Council will require new development to have considered the impact of noise.

7.108 The impacts of the proposed development in respect of noise on the surrounding area have been considered in the Noise & Vibration Assessment submitted with the application. It concluded that there are potential operational noise impacts due to changes in road traffic flows and fixed plant associated with the development. However, the results of noise calculations using predicted future road traffic flows indicate that associated noise will have a very low impact. In addition to this, fixed plant will be designed based on policy EQ5, which requires noise emanating from such plant to be at least 10dB below the background noise levels. This will be secured by condition.

7.109 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.

Summary

7.110 Whilst the proposal would impact neighbouring residential properties in terms of loss of daylight and overshadowing and outlook, it is not considered that these would result in an unacceptable impact on amenity that would sufficiently outweigh the benefits of this proposal in terms of the key objectives for the delivery of much needed housing including a proportion of affordable housing and the regeneration of this site within the wider town centre and the potential increased vitality and viability it would bring to the town centre. As such, it is considered that the proposal would broadly be in accordance with the NPPF, London Plan and adopted Local Plan policies SC4, CC2 and EQ5 as identified above.

Highways, Transport, and Access

7.111 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.

7.112 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.

7.113 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.

7.114 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.

7.115 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.

7.116 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.

7.117 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.

Highway Status

7.118 The site fronts London Road which is classified as the A315 linking Bedfont, Hounslow, Brentford and Chiswick. This is a TfL Strategic Route. The footpath at the northern end of the site is adopted footway.
Proposed Vehicular Access

7.119 It is proposed to retain two vehicular accesses to the site. The main access would be at the eastern end of the site and would allow two-way traffic. This would provide access to the parking bays for the mews houses, delivery access to the residential elements, the car club and visitor parking bays.

7.120 The western access would be in-only and provide access for deliveries to the commercial units and the disabled parking bays. This access would be gated to prevent general access. The gates would be set back 12m from the public highway. This will allow vehicles up to that length to wait clear of the footway whilst the gates are opened. The position and detail of these gates should be secured by condition.

Proposed Pedestrian Access

7.121 The main pedestrian access will be from the eastern access and this will provide a route from London Road to all of the residential units. It is also proposed that a route will be provided to the public footpath that runs to the rear of the site from North Drive to Kingsley Road. This will provide pedestrian access from the site and London Road to Hounslow East station. Improvements are proposed including provision of an additional street lighting column, CCTV camera on the wall of the development and additional landscaping to remove hidden corners. The detail of these works will need to be agreed and undertaken either under a s278 Agreement or by a s106 contribution. The inclusion of this pedestrian route and general improvements is welcomed.

Parking Provision and impact

7.122 It is proposed that the development will be car free with exception of 31 disabled parking spaces which will be provided on the ground floor of Block A and on the internal site road, one parking space for each of the mews houses, 3 short term visitor parking bays and a car club parking bay. These parking bays will need to be managed to ensure that they remain available for those who require them at all times. For example, the disabled bays are proposed to be allocated to the wheelchair accessible units but if they are not required by residents of these units they could be offered to other residents who are Blue Badge holders; the EV charging points need to be made available to those with electric cars; the short term visitor parking bays are to be restricted to residential visitors only; the car club bay is to be available free of charge for the lifetime of the development. These details would be secured as part of a Car Park Management Plan. A Delivery and Servicing Plan will be required but the CPMP will need to ensure the site is managed in such a way that deliveries are managed in an acceptable way and there is not indiscriminate parking especially close to the junction with London Road.

7.123 The site is located in the Hounslow Town Centre North (HTCN) CPZ which operates on Monday to Friday 9.30am-5.30pm and Saturday 9am-12.30pm. The Hounslow Town Centre South (HTCS) CPZ operates the same hours. The fact that the CPZ operates on a Saturday morning will help to dissuade people who work Monday-Friday and don’t need a permit (because they go to work before it comes into operation and return afterwards) because they would have move their cars to an unrestricted area on a Saturday morning which is inconvenient.
7.124 The Council is currently in the process of extending neighbouring CPZs in Spring Grove and this will further restrict the ability of future residents to park in uncontrolled areas close to the site.

7.125 The Council has already secured £20,000 funding to undertake a review of roads in the HTCN CPZ close to the High Street Quarter through the s106 agreement for that development. This would cover consultation on an extension of hours of operation rather than a physical extension, due to the proposed cinema and additional commercial units. An additional £10,000 of funding has also been secured through the s106 agreement for the Hounslow Town School development to investigate extensions to the HTCS CPZ.

7.126 However, there are still roads in the vicinity of the site that are not included in a CPZ and it is considered that consultation will need to take place with residents to consider extending the CPZ to cover these area. Therefore, it is considered that additional funding for CPZ review is secured in the s106 agreement. This will ensure that the potential impacts of all the town centre developments can be mitigated.

7.127 It is proposed that residents of the proposed development will not be eligible for parking permits in accordance with Council policy (Policy EC2 of the Local Plan).

7.128 A car club parking bay is proposed on the site close to London Road. The car club parking space will be secured as a s106 obligation. The developer will be required to use reasonable endeavours to enter into a contract with a car club operator, and residents will need to be offered membership of the car club as part of the Sustainable Travel Vouchers which will be offered to all residents when they move in.

7.129 It is considered that the level of car parking proposed for this development is acceptable, given the site’s location in an area of excellent public transport accessibility, the existing restrictions on on-street parking in the surrounding area and the sustainable transport proposals (car club, travel plan, etc).

**Trip Generation and Traffic Impact**

7.130 The low level of parking provision for the residential development will mean that there will be a low level of car borne trips. The site previously had permission for a Tesco superstore and it was considered that development was acceptable where there would be a substantial number of vehicle movements associated with that use.

7.131 The applicant has predicted the potential level of trip generation that could be generated by the proposed development. They have used 3 different scenarios to ensure that the assessment is robust. The methodologies are accepted and considered appropriate for this development. In terms of vehicular movements, these will be insignificant given the number of parking spaces that are proposed.

7.132 As such it is not considered that the proposal would have a significant impact on the local road network in terms of congestion and additional vehicle movements to/from the site.

**Public Transport Impact**
Given the low level of on-site parking the majority of trips, therefore, would be by public transport with a smaller number of walking and cycling trips. TfL, as the responsible authority, has assessed the implications of the development on public transport capacity, including local bus services and the Piccadilly Line and raises no objection.

**Servicing**

As stated above, it is proposed that servicing for all of the commercial units would take place using the western access. This is considered to be acceptable in principle. A 16.6m loading bay is proposed within the site and this would accommodate one delivery vehicle at a time. However, the loading bay should be able to accommodate 2 smaller 10.5m rigid lorries with space for both to unload. The loading bay should therefore be extended to accommodate this situation and should be secured as a condition. Commercial delivery vehicles must not use the main eastern site access or attempt to park on-street.

Given that the loading bay is external to the building, means to mitigate noise impacts must be provided which may include a canopy and a smooth surfaced route from the bay to the delivery area within the building. These requirements will be secured by condition.

Given the location of the bus stops/shelters and the cycle lane any deliveries made from the public highway will be unacceptable and all deliveries must take place within the site. The applicant has confirmed that a 10.5m lorry is the largest vehicle that can be accommodated within the site. Therefore, a restriction on the size of delivery vehicle must be secured along with a condition preventing deliveries from taking place on the public highway. Any alternative delivery arrangements, including larger vehicles that may be needed to serve a single commercial use (since the future end users are currently unknown) will need to demonstrate that such vehicles could be accommodated within the site itself and any variation to these conditions would not be approved in the circumstances what would lead to delivery vehicles obstructing any part of the public highway, including footway, cycle lane or bus stops, reversing into or out of the site, or obstructing the site access. If the commercial space is divided into smaller units a route will need to be provided within the site or internally within the building to ensure that all units can be serviced from within the site. This is to be secured by condition.

Deliveries to the residential units will take place predominantly from the main site access. However, delivery vehicles will need to be managed to ensure they do not park close to the junction with London Road. Turning areas are provided within the site and a concierge area is also provided. Drivers delivering to dwellings on the font blocks (C-E) will be expected to drop deliveries with the concierge rather than to individual flats and space must be provided for deliveries to be stored including a refrigerated area for food deliveries. A Delivery and Servicing Plan will be secured by condition and it will be expected to cover all of the points described above.

**Public Realm; Bus, Pedestrian and Cycling Infrastructure**

Given the location of the site, consideration of the public realm in the vicinity is important to ensure that pedestrians, cyclists, and public transport users are not compromised by the proposed development.
7.139 There are currently two bus stops with shelters to the front of the site. These bus stops serve a large number of routes and are very busy. Given that the development will essentially be car free there will be an increase in the use of these bus stops as a direct result of the proposed development.

7.140 The Council is currently developing plans for cycle improvements along the A315. This is a particularly difficult part of the route due to the bus garage, bus stops, proximity of important junctions and the central island on London Road. The applicant has submitted a plan showing potential public realm improvements. The proposals would see a widened footway with a “floating bus stop” and new off-street cycle lanes and cycle parking. This is considered to be acceptable in principle, but would have to be subject to detailed design and review including a Road Safety Audit. Therefore, it is considered that these proposals, which will also include the revised site access arrangements, are included within a s278 Agreement so that they can be fully safety audited, reviewed, and detailed design undertaken before implementation. The s278 Agreement will also include the proposed vehicular accesses including any works to the central island (to accommodate any cycle lane improvements) and road markings. It will also include all relevant changes to Traffic Orders.

7.141 The proposals would retain the central island on London Road which is an important feature in assisting pedestrians to cross the road. The Kingsley Road junction to the west has a pedestrian signalised crossing and there is a zebra crossing to the east of the site but significant numbers of people do not use them and instead cross between bus stops using the central island. For safety reasons, therefore, it is considered essential that this is retained.

**Cycle Storage**

7.142 Cycle storage is proposed for each of the residential blocks and is considered to be of generally of good quality. This will be provided in easily accessible stores and in accordance with London Plan standards in respect of numbers. The Local Plan sets out other guidance in terms of design including accessibility and size of cycle stores. The details of the design of the cycle stores will need to be secured by condition.

7.143 The cycle storage for the commercial unit is noted as being indicative. Full details will need to be secured by condition, with details submitted and approved prior to commencement.

**Travel Plan**

7.144 The Council has produced a 10 point guide for development travel plans. Detailed Travel Plans for the commercial and residential elements of the development will be required and secured in the s106 Agreement. These will need to include baseline modal share based on the information contained within the TA and appropriate targets thereafter. Sustainable travel welcome packs and sustainability vouchers to the value of £100 for each residential unit will be secured.

**Construction**

7.145 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.

7.146 Routing of vehicles from the strategic road network to the site should be considered early given the level of development expected to be taking place across Hounslow town centre in the coming years. 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 noting the potential for conflict with the existing bus stops/stands during this phase of development.

Summary

7.147 The proposal would include significant benefits in terms of the promotion of more sustainable modes of transport, including improved pedestrian and cycle links to and around the site as well as a significant provision of cycle storage across the site. Given the low levels of parking proposed on the site it is not considered that the proposal would result in a significant impact on the local road network in terms of vehicle movements, whilst the highly accessible location serves to justify the low levels of parking on site when considered against the existing and potential expanded restrictions on on-street parking in the local area.

7.148 Subject to further details and highway works, to be secured by condition and in the accompanying S106, it is considered the proposal would be acceptable in highway safety terms and would not prejudice the safety of pedestrians or other road users and would not result in a severe impact on the local road network. 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.

Energy and Sustainability

7.149 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.

7.150 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.

7.151 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.

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

7.153 London Plan Policy 5.2 (Minimising carbon dioxide emissions) requires
developments to make the fullest practicable contribution to minimising CO\textsubscript{2} emissions following this energy hierarchy:

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

7.154 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 and that where it is clearly demonstrated that the specific targets cannot be fully achieved on-site, any shortfall may be provided off-site or through a cash in lieu contribution to the relevant borough to be ring fenced to secure the delivery of carbon dioxide savings elsewhere.

7.155 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’.

7.156 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. It goes on to state that where appropriate developments should make a financial contribution to an agreed borough-wide programme for carbon reductions where required reductions cannot be achieved on-site.

7.157 An Energy Statement has been submitted which sets out how the proposed development will achieve the reductions in CO\textsubscript{2} emissions required by the above policies and meet the other sustainability criteria set out in these policies.

7.158 It has been demonstrated that through the energy hierarchy the proposal will achieve a 36% CO\textsubscript{2} emissions reduction over Part L Building Regs (2013). This would be achieved through the delivery of a high standard of passive design, fabric performance and energy efficiency to reduce energy demands, a decentralised energy system in the form of a CHP with adequate space for connection to a future District Heat Network should one become available, and the installation of PV across the site (approx. 134sqm) and air-source heat pumps to provide on-site renewable energy generation.

7.159 Local Plan policy EQ2 requires new non-residential developments over 500m to achieve an ‘Excellent’ BREEAM rating. A pre-assessment has demonstrated that a score of 71 (against a target of 70) can be achieved to reach the ‘Excellent’ requirement. Further design and construction assessments to ensure this target is achieved will be secured by condition.

7.160 The proposals would also incorporate living roofs and measures to restrict water usage to a maximum of 105 litres per person per day.

7.161 Additional information has been provided to the GLA to satisfy their concerns which were raised as part of the Stage 1 referral, including further information to minimise overheating to reduce the cooling demand, and will form part of the
Stage 2 referral.

7.162 The Council’s Sustainability consultants (Low Carbon Europe) have reviewed the submitted information and have confirmed that this strategy is acceptable and represents the best approach to CO2 emissions reductions given the constraints on this site. This approach has been supported by the GLA. The safeguarding conditions would ensure that the measures proposed are implemented and that the BREEAM ‘Excellent’ rating is achieved and that the development is carried out in accordance with the approved Energy Statement. It is therefore considered that the proposed energy strategy is acceptable and would comply with the policies of the London Plan and adopted Local Plan listed above.

Other environmental considerations

Archaeology

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

7.164 A portion of the site lies within an Archaeological Priority Area as defined by the adopted Local Plan, associated with the conjectured course of a Roman road along the line of the modern High Street/Staines Road, and the historic settlement of Hounslow.

7.165 The applicant has commissioned and submitted an archaeological assessment that includes on-site evaluations in support of the application.

7.166 Historic England’s archaeology advisor has reviewed the submitted information and concludes that given the comprehensive nature of the archaeological assessment undertaken, no further archaeological work or safeguarding condition is necessary given the low likelihood of any further archaeological remains on the site.

Flooding & drainage

7.167 The Site is shown on the EA Flood Map for Planning 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. However, there is a risk of surface water flooding identified in the Strategic Flood Risk Assessment and Surface Water Management Plan with the site being located in a Critical Drainage Area and Local Flood Risk Zone.

7.168 A flood Risk Assessment has been submitted with the application which identifies measures that will be incorporated into the development to minimise and mitigate any surface water flooding. This includes the use of attenuation tanks, living/green roofs and a mixture of hard and soft landscaping to improve site-wide permeability and restrict the flow into the main sewerage network.

7.169 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 is satisfied with the principles of the drainage strategy but has indicated that further above ground SUDS measures should be
considered which could be used to attenuate runoff. As such it is considered that these details could be secured by condition to ensure the maximum level of surface water runoff mitigation is achieved.

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

**Contaminated land**

7.171 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**

7.172 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.”

7.173 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).

7.174 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).

7.175 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.

7.176 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.

7.177 An Air Quality Assessment has been submitted in support of the application. This concludes that the site is appropriate for residential development and air quality should not be used as a constraint to the granting of planning permission. It further concludes that the impact of additional emissions from road sources and the proposed energy plant during operation to sensitive receptors is considered to be negligible and the development will achieve Air Quality Neutral classification.

7.178 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).

7.179 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 the Local Plan (EQ4 and CC2), subject to safeguarding conditions.

Ecology

7.180 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;”

7.181 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”.

7.182 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.

7.183 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, although it is noted that there are a number of mature, established trees around the site that would
be of ecological value.

7.184 An Ecological Assessment has been submitted in support of the application. The survey identified that the site hosted a number of common habitats of negligible or low ecological value. It recommends that should any trees be felled, these are replaced to ensure no net loss of habitable and that a number of invasive species should be carefully removed. A number of mitigation measures are proposed in respect of bats to ensure any site clearance, including the felling of trees, would not affect roosting bats and any such activities should take place outside of April to October.

7.185 A number of general recommendations for ecological enhancement of the site are outlined within the assessment submitted with the application such as provision of landscape planting, habitat management and provision for nesting opportunities as well as the provision of living roofs.

7.186 A Tree Survey submitted with the application identified a total of 44 trees across the site. The proposed development would result in the removal of 34 of these identified trees, of which 3 were categorised a moderate B grade and 31 a low C grade. To mitigate the loss of these trees, it is proposed that some 74 replacement trees within new landscaping across the site will be planted. It is proposed that they will generally be of larger species where space allows.

7.187 Overall it is considered that given the local ecological value baseline of the site, the proposal will result in significant improvements to the ecology of the site and wider area through the implementation of the recommendations of the ecological report. Whilst the proposals would result in the loss of a number of trees on and around the site, these are not exceptional specimens and there would be new tree planting across the site as part of a comprehensive site wide landscaping strategy.

7.188 It is considered that given the substantial re-provision of trees across the site, alongside the retention of the highest quality trees on the site, the loss of 34 trees would be acceptable. It is recommended that all tree works are conditioned and that the proposed replacement tree strategy is set out in a wider landscaping condition.

8.0 Planning Obligations

8.1 Local Plan Policy IMP3 seeks to ensure that development proposals fully mitigate the impacts of the development on the area through a Section 106 agreement, where necessary or appropriate, having regard to supplementary planning document and provide the CIL payments required by any charging scheduled, including the Mayor of London’s CIL. A payment or other benefit offered in a Section 106 agreement is not material to a decision to grant planning permission and cannot be required unless it complies with the provisions of the Community Infrastructure Levy Regulations 2010 (regulation 122), which provide that the planning obligation must be:

(a) necessary to make the development acceptable in planning terms;
(b) directly related to the development; and
(c) fairly and reasonably related in scale and kind to the development.

7.1 The Section 106 agreement will not address all the impacts since some of these
will be addressed by CIL, in order to satisfy the Regulation 122 tests above.

7.2 The NPPG provides guidance on use of planning obligations, which may impose a restriction or requirement, or provide for payment to make acceptable development proposals that might otherwise not be acceptable in planning terms. The Council’s Supplementary Planning Document on Planning Obligations (adopted March 2008) contains guidance on imposition of planning obligations in compliance with such guidance. These obligations may offset shortfalls in the scheme or mitigate a development’s impacts.

7.3 The following draft Heads of Terms are likely to form the basis of the Section 106 agreement, all of which are considered to satisfy the three Regulation 122 tests referred to above:

i) On-site delivery of affordable Housing (19 affordable rent units and 19 shared ownership units with Council nominations of the affordable rent units)

ii) Review mechanism to capture any uplift in viability with a profit share for a financial contribution towards offsite affordable housing delivery.

iii) Construction training – in accordance with the Council’s Planning Obligations & CIL SPD (£2,750 for every £1m construction costs)

iv) End-user employment training strategy – in accordance with the Council’s Planning Obligations & CIL SPD

v) Travel Plan for the commercial and residential development (to include £100 sustainability travel voucher for all new residents)

vi) Two Car Club parking bays (provided free of charge and in perpetuity)

vii) CPZ contribution towards consultation and implementation of an expansion to the Hounslow Town Centre North CPZ (£10,000)

viii) Bus stop upgrade works to shelters on both sides of London Road (contribution to be confirmed following discussions with TfL)

ix) Permanent 24-hour public access through the site

x) Restriction on residents’ eligibility for parking permits

xi) Restriction on the size of delivery vehicles to be no greater than 10.5m

xii) Car parking management plan provided prior to occupation of the development (to include restriction on the use of the short term bays for visitors to the residential units only, active management of the site to prevent parking except within marked bays, active management of deliveries to ensure they take place in identified locations, allocation of disabled bays and EV charging points to maximise use)

xiii) Delivery and Servicing Management Plan provided prior to occupation of the commercial units to include details on management of commercial deliveries and ways in which the maximum length of lorries will be enforced

xiv) S.278 works associated with the new development (to including works to London Road and the public footpath to the rear of the site to be submitted and approved with all works undertaken under a s278 Agreement including amendments to Traffic Orders. The works to London Road are to be generally in accordance with Plan PL44 rev.B included in Appendix E of the Transport Assessment unless otherwise agreed in writing by the council,)
xv) Considerate Contractors Scheme

9.0 EQUALITIES DUTIES IMPLICATIONS

9.1 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.

10.0 COMMUNITY INFRASTRUCTURE LEVY

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

10.2 CIL is payable on m² of new floor space or where a new dwelling is created or the net floor area increase exceeds 100 m².

<table>
<thead>
<tr>
<th>Mayor’s £35 per square metre</th>
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<tbody>
<tr>
<td>Hounslow:</td>
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<tr>
<td>Housing:</td>
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<tr>
<td>East £200/m²</td>
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<tr>
<td>Central £110/m²</td>
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<tr>
<td>West £70/m²</td>
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<tr>
<td>Supermarkets, superstores</td>
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<tr>
<td>and retail warehousing:</td>
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<tr>
<td>£155/m²</td>
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<tr>
<td>Health care, education and</td>
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<tr>
<td>emergency services facilities: £0</td>
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<tr>
<td>All other uses:</td>
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<td>£20/m²</td>
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10.3 This proposal would be liable to pay a Community Infrastructure Levy charge.

11.0 CONCLUSION

11.1 The proposal would result in the re-development of this large site that falls across the Hounslow Town Centre boundary, which would provide for the delivery of much needed housing, including a provision of affordable housing on-site as well as a flexible commercial space, public realm improvements and landscaping across the site.

11.2 The scheme is considered to be of a high design quality, suited to the existing site and surroundings and which would provide a high standard of residential accommodation alongside a commercial use that would support the existing economic offer within the wider town centre. The proposal is considered to relate well to the local character and context, reflecting the site’s location on the fringes of the town centre and the transitional scale of development from the north and east to the west. Through a well-thought out architectural approach, the development has sought to reduce the impact of the additional scale and mass on the site through intelligent use of materials and by articulation through building features that will help to engender identity and legibility. The proposals would promote permeability through and around the site with significant benefits proposed to the public realm environment in the vicinity of the site.

11.3 By being located within the town centre, with its excellent public transport connections, any increase car movements to/from the site will be negligible from the previous situation (and the extant permission) with an emphasis on promoting alternative means of travel, whilst it is noted that there is sufficient public car parking availability elsewhere in the town centre. Furthermore, the proposal would include a number of sustainable transport measures, including
car club spaces, high levels of cycle storage, Travel Plans for both the residential and commercial development to promote alternative modes of transport which would work together with other measures to limit any overspill parking on surrounding streets.

11.4 As such, it is considered that the scheme is an appropriate response to the planning framework for the site and it will bring substantial benefits to the environmental, social and economic well-being of the area, notably those arising from the delivery of new residential development on this site including the provision of affordable housing on site, as well as the regeneration this scheme will bring to the wider 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 as set out throughout this report.

12.0 **RECOMMENDATION**

That planning permission be **granted** subject to Stage II referral to the GLA and the following conditions and securing the abovementioned planning obligations by prior completion of a satisfactory legal agreement or unilateral undertaking under Section 106 of the Town and Country Planning Act 1990 and/or other legislation (including any agreements under Section 278 or Section 38 of the Highways Act 1980), the exact terms of which shall be negotiated by appropriate officers in the Department of Regeneration, Economic Development & Environment on the Head of Governance’s advice.

The satisfactory legal agreement or unilateral undertaking outlined above shall be completed and planning permission issued by 14th December 2016 or such extended period as may be agreed in writing by appropriate officers within the Department of Regeneration, Economic Development & Environment or Head of Governance’s Office.

If the legal agreement or unilateral undertaking is not completed by the date specified above (or any agreed extended period), then the Executive Director Regeneration, Economic Development & Environment or Director – Community Safety, Environment and Regulatory Services or the Head of Development Management is hereby authorised to refuse planning permission for the reason that the proposal should include planning obligations required to make the development acceptable in planning terms in accordance with Regulation 122 of the Community Infrastructure Levy Regulations 2010, development plan policies and the Planning Obligations SPD described above.

Following the grant of planning permission, where (a) requested to enter into a deed of variation or legal agreement in connection with the planning permission hereby approved and by the person(s) bound by the legal agreement authorised in paragraph 1 above, and (b) where the planning obligations are not materially affected, and (c) there is no monetary cost to the Council, the Executive Director Regeneration, Economic Development & Environment or Director – Community Safety, Environment and Regulatory Services or the Head of Development Management is hereby authorised (in consultation with the Chair and upon the advice of the Head of Governance) to enter into a legal agreement(s) (deed of variation) made under Sections 106 and/or 106A of the Town and Country Planning Act 1990 and or other appropriate legislation.
If planning permission is refused, the Executive Director Regeneration, Economic Development & Environment or Director – Community Safety, Environment and Regulatory Services or the Head of Development Management (in consultation with the Chair) is hereby authorised to approve any further application for planning permission or listed building consent validated within 12 months of the date of refusal of either application, provided that it (a) duplicates the earlier application, and (b) that there has not been any material change in circumstances in the relevant planning considerations, and (c) that a satisfactory legal agreement or unilateral undertaking securing the obligations set out in the report is completed within any specified period of time.

**Conditions:**

To follow

**Drawing Numbers:**

To follow