

Key Site 1, High Street, Hounslow, TW3

in the London Borough of Hounslow

planning application no. 00616/F/P19

Strategic planning application stage II referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Demolition of commercial and residential properties, site clearance and mixed use redevelopment comprising five blocks up to 27 storeys with 527 residential units (311 private units, 108 shared ownership units and 108 affordable rent units), a multiscreen cinema (Use Class D2) of 5,267sqm (GEA), 9,830sqm (GEA) of retail, restaurant and cafe uses (Use Classes A1, A2, A3, A4 and A5), infrastructure including 513 parking spaces, 686 cycle parking spaces, service areas, public realm incorporating pedestrian/cycle circulation areas with associated hard and soft landscaping and private amenity spaces

The applicant

The applicant is **Barratt London** and the architect is **tpbennett**.

Strategic issues

The principle of a **mixed use** development in Hounslow Town Centre is welcomed and the provision of a cinema and retail space is strongly supported. Amendments have been made and clarification provided to address concerns over **play space, layout, architecture, scale** and **residential quality**, and consequently the scheme meets strategic policy guidance.

Further information in relation **climate change, parking** and **transport** impact, conditions and S106 contributions has been provided and the scheme is now in accordance with the London Plan.

The Council's decision

In this instance Hounslow Council has resolved to grant permission.

Recommendation

That Hounslow Council be advised that the Mayor is content for it to determine the case itself, subject to any action that the Secretary of State may take, and does not therefore wish to direct refusal or direct that he is to be the local planning authority.

Context

1 On 14 April 2015 the Mayor of London received documents from Hounslow Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. This was referred to the Mayor under the following categories of the Schedule to the Order 2008:

1A - Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats;

1B - Development which comprises or includes the erection of a building outside Central London and with a total floorspace of more than 15,000 square metres; and

1C - Development which comprises the erection of a building that is more than 30 metres high and is outside the City of London.

2 On 13 May 2015 the Mayor considered planning report D&P/3492/01, and subsequently advised Hounslow Council that whilst generally acceptable in strategic plans, the application did not fully comply with the London Plan, with the reasons and remedies set out in paragraph 75 of the above-mentioned report.

3 A copy of the above-mentioned report is attached. The essentials of the case with regard to the proposal, the site, case history, strategic planning issues and relevant policies and guidance are as set out therein, unless otherwise stated in this report. On 5 November 2015, Hounslow Council decided that it was minded to grant planning permission, and on 3 December 2015 it advised the Mayor of this decision. Under the provisions of Article 5 of the Town & Country Planning (Mayor of London) Order 2008 the Mayor may allow the draft decision to proceed unchanged, direct the Council under Article 6 to refuse the application or issue a direction to the Council under Article 7 that he is to act as the Local Planning Authority for the purposes of determining the application and any connected application. The Mayor has until 16 December 2015 to notify the Council of his decision and to issue any direction.

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 has been taken into account in the consideration of this case.

5 The decision on this case, and the reasons will be made available on the GLA's website www.london.gov.uk.

Update

6 At the consultation stage Hounslow Council was advised that the scheme was broadly acceptable in strategic planning terms, but that further information and changes were required in relation to play space, density, urban design, inclusive design, climate change and transport, to ensure full compliance with the London Plan. Addressing each point in turn:

Children's play space

7 At the initial consultation stage, clarification was sought over the quantum of play space proposed, as the figure differed between submitted documents. It has been confirmed by the applicant, and verified on the plans, that 1,160 sq.m. of play space would be provided across the scheme. This would satisfy the requirements of the London Plan and is welcomed. The Council will secure details of play space by condition.

Density

8 At the consultation stage, the applicant was asked to calculate the density based on the net residential site area, given the mixed use nature of the scheme. A revised density calculation has

been provided by the applicant, although this does not appear to have been carried out in accordance with paragraph 1.3.63 of the Mayor's SPG 'Housing', whereby the site area is adjusted to account for the non-residential elements of the scheme. Based on the floorspace figures set out in the application, the net density of the scheme would be 376 units per hectare and 1,019 habitable rooms per hectare. The proposed density would therefore be within the optimum range set out in Table 3.2 of the London Plan, having regard to the characteristics of the site, and would therefore accord with the London Plan.

Urban design – visual impact of the tower

9 At the initial consultation stage, the principle of a tall building in this location was considered acceptable and no impacts on strategic views were identified. Further details on the views of the scheme from the high street were however sought to address the local impact of the proposals. In response, the applicant has submitted an additional view taken from along the High Street to the east. This view demonstrates that the tower would be largely obscured by existing buildings and the scale would be appropriate in the context of the town centre location. Furthermore, the Council raise no concerns over the impact on local views and the visual impact of the proposal does not therefore raise any strategic concerns.

Urban design – cinema layout and public realm

10 At Stage I, the applicant was requested to revisit the ground floor western frontage of the cinema to make the pedestrian environment along this stretch of Alexandra Road/Red Lion Mews more safe and inviting. In response, the applicant has amended the ground floor elevation to incorporate different surface treatments and provided details of a variety of materials of differing texture. Whilst this amendment would not increase the active frontage of the cinema, it is recognised that this is a significant challenge with this type of use. The proposed amendments would add visual interest to this facade and in addition the submitted Pedestrian Route Strategy contains further details of how pedestrian movements will be encouraged on the western side of the road, which is welcomed. Overall, the amendments made would demonstrate how pedestrian movements would be delineated from the servicing access to the south and to ensure that this route would be safe and inviting. The applicant is encouraged to carry this through to implementation through the use of high quality materials and landscaping.

Residential quality

11 At consultation stage, the applicant was requested to revisit the layout of block B to reduce the number of units served by this core, possibly by extending the corridor from block A. The applicant has investigated this, but any such amendments would reduce the proportion of dual aspect units and increase north facing single aspect units. The resultant travel distance from this core would also be unacceptable in terms of fire regulations. Considering these circumstances, this would be the optimal layout and GLA officers are satisfied that this aspect has been satisfactorily addressed.

12 In addition, GLA officers raised concerns over the proportion of north facing units to the north of blocks A and C, which could be impacted by the proximity and massing of the Blenheim Centre. The applicant has clarified that the extent of single aspect north facing units in this area is limited to one on each floor of blocks A and C, which would be equivalent to one in four of the units in question. Furthermore, it has been confirmed that the Blenheim Centre would be sited some 30 metres from the development. Overall, the proportion of single aspect north facing units in this area would be low and the does not raise strategic concerns in relation to residential quality.

Appearance and materials

13 At Stage I, the applicant was requested to investigate changes to the tower element to introduce more depth and complexity, experimenting with a more varied material palette and further articulating the building's roofline. The applicant has provided a variety of options for configuration of materials and recesses, all of which would result in an improved emphasis of the vertical proportions of the tower on the east and west elevations, which is welcomed. The details of the final elevation treatments will be developed further with the Council and will be secured by condition, along with full details of materials to ensure a high quality finish. This approach is supported.

Inclusive design

14 At consultation stage, the applicant was requested to provide further information concerning the management of blue badge parking spaces, including how they would be allocated to units and how further spaces will be allocated should the need arise. The draft S106 agreement contains a mechanism for the review of blue badge parking spaces throughout the phases of development, including the potential to increase provision where necessary. This would be managed through a residential car parking management plan that will also be secured through the S106. This approach is supported.

Sustainable development

15 At initial consultation stage, there were some matters of clarification and further information sought in relation to energy, noise and flooding.

16 Regarding the energy strategy, further information has been provided in relation to overheating, connection to future district heating networks and the design of the CHP and site heat network. A condition is proposed requiring the scheme to be carried out in accordance with the energy strategy, which is welcomed, and this will ensure that the development complies with London Plan energy policy.

17 In terms of noise impacts, GLA officers requested that conditions be imposed to ensure that the living standards of future occupiers are not compromised. The Council have imposed conditions requiring noise insulation measures to be approved and incorporated into the design of the buildings, which is welcomed.

18 Regarding flooding, at consultation stage it was requested that a condition be imposed to seek a surface water drainage scheme. The Council have imposed a condition requiring a drainage scheme to be approved and implemented, to achieve a 50% reduction in surface water discharge, which is welcomed.

Transport

19 At Stage I TfL requested clarification on blue badge space provision, justification for loss of town centre parking, an increase in cycle parking and shower facilities, as well as the provision of a shared pedestrian/cycle facility through the site. Furthermore, a pedestrian environment review system (PERS) audit was requested, trip generation modelling required clarification and a taxi rank was requested. In addition, Legible London signage, travel plan, car park management plan, delivery and service plan, construction logistics plan, electric vehicle charging points should be secured by condition/S106 agreement.

20 In response to TfL's request for justification on the quantum of retail car parking proposed, the Council stated that the site will accommodate the displacement of other spaces across the town centre, which are considered vital in maintaining Hounslow's competitiveness. This is accepted by TfL. It is also welcomed that electrical vehicle charging points (EVCPs) in line with the London Plan have been secured by condition. Residential blue badge parking has not been increased, although TfL accepts that demand can be monitored through the parking

management plan included within the section 106 heads of terms and further spaces provided as required.

21 The quantum of commercial and public cycle spaces have been increased and this is welcomed along with improvements to their access and the inclusion of shower and changing facilities. Nevertheless, the residential cycle spaces do not conform to the current London Plan standards due to space constraints. The applicant has however agreed to monitor uptake and convert car parking spaces to cycle parking as demand dictates and this will be secured within the parking management plan. On balance, this is acceptable in this instance.

22 It is understood that the site is unable to accommodate a taxi rank and therefore further discussion with the Council would be required outside of the planning process to identify a suitable location within the town centre.

23 The s278 agreement will secure the details of the relocated bus stops and amendments to the local highway network deemed necessary to mitigate the uplift in local traffic.

24 TfL now accepts that due to space constraints and conflict with pedestrians it would not be appropriate to accommodate cycling through the site. It is also noted that improvements to the High Street will deliver a segregated contra-flow lane which will enhance east-west links for cyclists. To enhance north-south links TfL would recommend that CIL funding should be allocated towards improving the level of service for cyclists at the Laurence Road/High Street/School Road junction.

25 A PERS audit has now been submitted and TfL would similarly recommend that the Council allocate CIL funding appropriately to deliver the improvements identified in tandem with additional Legible London signage within the site.

26 All other matters raised at Stage I have been addressed through the section 106 heads of terms or planning conditions - those include a construction logistics plan, delivery and servicing plan and travel plans.

27 TfL and GLA officers can therefore confirm that the scheme is now in conformity with London Plan strategic transport policies.

Response to consultation

Local neighbourhood consultation

28 The application was advertised by site and press notices, and with consultation letters sent to 1,905 neighbouring properties. A re-consultation exercise was undertaken in relation to amendments to the scheme. 137 responses were received, three of which from representatives of the adjacent Royal Mail depot supporting the scheme in principle with comments, the rest in objection. Concerns raised by the objectors relate to the following issues:

- *Design and amenity:* excessive density, cinema design would be garish, the tower would be ugly, incongruent and too tall at 27 storeys, risk of major accident due to proximity to Heathrow, poor daylight to open spaces within the scheme, proposed planting not appropriate, tall buildings would create wind impact, top of tower should be publically accessible, lack of publically accessible green space and connectivity to High Street, too much demolition, dark alleys will lead to criminal activity, impact on neighbouring amenity from noise, overshadowing and pollution.
- *Transport:* proposals will generate too much traffic, increase strain on town centre parking, congestion on buses and tube, no motorbike parking, concern over loss of parking for

Blenheim Centre residents, impact on access to rear of High Street properties, travel plan, delivery and servicing plan and construction travel plans should be secured by condition.

- *Demolition of commercial uses:* loss of existing businesses would be contrary to policy and a loss to the community, no re-provision of B1 space.

29 The application was also presented to a local forum, where local Councillors made the following comments: concern over wind tunnel effect, overlooking, access, excessive building height, inclusive access and parking provision.

30 Hounslow Central Residents Association, a local amenity group, responded with the following concerns:

- The proposals are contrary to the Council's town centre masterplan.
- The Hounslow House development was recently refused on the basis that it failed to take into account the scale and character of the surrounding area.
- Building heights increase towards the places where they confront existing homes most directly.
- The submission fails to adequately justify the daylight, sunlight and solar glare impacts.
- The 27 storey tower looks very wide from the east and west.
- Access through residential streets would be inadequate.
- The S106 should ensure that controlled parking zone is extended, that Hounslow Central Station is improved and that health and education facilities will be contributed to.

Representations to the Mayor of London

31 In addition to the above, the following letters were sent directly to the Mayor, requesting that the application is taken over for decision for the following reasons:

- **Bhagal Partners, 174 High Street:** Proposal would result in the demolition of our building and don't believe that the building is affected by the previous permission. Concerns expressed over the Council's ability to provide information. The Council have failed to maintain adequate stock of office space to enable relocation or provide new space in the scheme.
- **Specsavers, 174 High Street:** Proposal does not comply with Local Plan policy concerning loss of office space without compensation. There would be a loss of jobs associated with the demolition of the Specsavers store. Scheme doesn't comply with Council masterplan in terms of pedestrian routes and demolition.
- **Hounslow Central Residents Association:** Concern over quality of scrutiny, response to consultation and errors in reports. Scheme does not comply with Council masterplan for the site. Concern about impact on local roads and underground capacity, loss of light, poor daylight levels within the scheme. Scheme does not accord with London Plan and Local Plan policies on tall buildings. Concerns are also raised in relation to the quality of consultation and why a different view has been taken compared to a previous application.

Statutory consultees and local bodies

32 Other statutory consultees responded as follows:

- **Historic England:** Recommend a condition to ensure archaeological works are carried out.

- **Environment Agency:** The scheme poses a low environmental risk to flooding, controlled waters and the water environment.
- **BAA Aerodrome Safeguarding:** Recommended conditions requiring details of lighting and bird hazard management, to accord with aerodrome safeguarding criteria
- **Civil Aviation Authority/National Air Traffic Services:** Recommend appropriate mitigation in the form of a radar mitigation scheme and crane operation plan, to be secured by condition.

33 In relation to the objections and points raised, these have been addressed in the Council report and strategic matters about employment, housing density, transport and scale of development/tall buildings in particular, have been addressed in this report and the initial consultation. Procedural matters concerning the Council's handling of the application and related enquires are not relevant to the Mayor's decision. Overall, the scheme has been found to be acceptable, in accordance with local and strategic policy and guidance.

Article 7: Direction that the Mayor is to be the local planning authority

34 Under Article 7 of the Order the Mayor could take over this application provided the policy tests set out in that Article are met. In this instance the Council has resolved to grant permission with conditions and a planning obligation, which satisfactorily addresses the matters raised at Stage I, therefore there is no sound planning reason for the Mayor to take over this application.

Legal considerations

35 Under the arrangements set out in Article 5 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor has the power under Article 6 to direct the local planning authority to refuse permission for a planning application referred to him under Article 4 of the Order. He also has the power to issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. The Mayor may also leave the decision to the local authority. In directing refusal the Mayor must have regard to the matters set out in Article 6(2) of the Order, including the principal purposes of the Greater London Authority, the effect on health and sustainable development, national policies and international obligations, regional planning guidance, and the use of the River Thames. The Mayor may direct refusal if he considers that to grant permission would be contrary to good strategic planning in Greater London. If he decides to direct refusal, the Mayor must set out his reasons, and the local planning authority must issue these with the refusal notice. If the Mayor decides to direct that he is to be the local planning authority, he must have regard to the matters set out in Article 7(3) and set out his reasons in the direction.

Financial considerations

36 Should the Mayor direct refusal, he would be the principal party at any subsequent appeal hearing or public inquiry. Government Planning Practice Guidance emphasises that parties usually pay their own expenses arising from an appeal.

37 Following an inquiry caused by a direction to refuse, costs may be awarded against the Mayor if he has either directed refusal unreasonably; handled a referral from a planning authority unreasonably; or behaved unreasonably during the appeal. A major factor in deciding whether the Mayor has acted unreasonably will be the extent to which he has taken account of established planning policy.

38 Should the Mayor take over the application he would be responsible for holding a representation hearing and negotiating any planning obligation. He would also be responsible for determining any reserved matters applications (unless he directs the council to do so) and determining any approval of details (unless the council agrees to do so).

Conclusion

39 Having regard to the details of the application, the matters set out in Hounslow Council's committee report, and its draft decision notice, this mixed use development in Hounslow Town Centre is acceptable in strategic planning terms. The scheme would provide an appropriate mix of uses, including residential uses, and would contribute towards the regeneration of the area. Further information has been provided, which together with conditions and section 106 obligations imposed by the Council address all strategic issues that were raised at Stage I. On this basis, there are no sound reasons for the Mayor to intervene in this particular case

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Hounslow Town Centre

13 May 2015

in the London Borough of Hounslow

planning application no. P/2015/0913

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Demolition of commercial and residential properties, site clearance and redevelopment to provide a mixed-use development comprising five blocks up to 27 storeys with 527 residential units (311 private units, 108 shared ownership units and 108 affordable rent units), a mulitscreen cinema (Use Class D2) 9,839 sq.m (GEA) of retail, restaurant and cafe uses (Use Classes A1, A2, A3, A4 and A5), infrastructure including 513 parking spaces, 686 cycle parking spaces, service areas, public realm incorporating pedestrian/cycle circulation areas with associated hard and soft landscaping and private amenity spaces.

The applicant

The applicant is **Barratt London** and the architect is **tpbennett**.

Strategic issues

The key strategic issues in this case is the **principle of the development, housing and affordable housing, tall buildings and strategic views, urban design, inclusive design, sustainable development and transport**.

Recommendation

That Hounslow be advised that while the application is generally acceptable in strategic planning terms the application does not comply with the London Plan, for the reasons set out in paragraph 75 of this report; but that the possible remedies set out in that paragraph could address these deficiencies.

Context

1 On 14 April 2015 the Mayor of London received documents from Hounslow Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 25 May 2015 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 1A, 1B and 1C of the Schedule to the Order 2008:

‘Development which comprises or includes the provision of more than 150 houses, flats or houses and flats’

‘Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings – (c) outside Central London and with a total floorspace of more than 15,000 square metres.’

‘Development which comprises or includes the erection of a building of one or more of the following descriptions – (c) the building is more than 30 metres high and is outside the City of London’

3 Once Hounslow Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 has been taken into account in the consideration of this case.

5 The Mayor of London’s statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

6 The site sits within Hounslow Town Centre. It is bound by Prince Regent Road to the north, Holloway Street to the east, Alexandra Road to the west and High Street to the south. The site is predominately flat and comprises an at grade public car park.

7 The high street to the south is busy and pedestrianised at this point, bound by three storey buildings. To the north is the Blenheim Centre which is much larger in scale at approximately nine storeys and contains retail at ground floor and residential above. Much of the surrounding townscape is two to four storeys.

8 This site has a long planning history. It was allocated for a town centre redevelopment in 2002, but only phase 1 of this redevelopment (the Blenheim Centre) was built out. The requirement of the site remains to be for an enhanced town centre offer, with an allocation in the UDP, draft Local Plan and principles outlined in the Hounslow Town Centre Masterplan. The site is within Hounslow’s Housing Zone.

9 The nearest section of the Strategic Road Network (SRN) is the A315 Hanworth Road, 200m to the south of the site and the A4 Great West Road, located 1km to the north of the site, is the nearest section of Transport for London Road Network (TLRN). The nearest London Underground station is Hounslow Central, which is located 340m from the centre of the site and served by the Piccadilly line. Sixteen bus services are available from stops on the adjacent Prince Regent Road, Hounslow High Street and Hounslow Bus Station. As a result, the site has a very good public transport accessibility level (PTAL) ranging from 5 to 6 (on a scale of 1 to 6 where 6 is excellent and 1 is very poor).

Details of the proposal

10 The application proposes the redevelopment of the entire site, including site assembly to provide 527 residential units (including affordable units) a cinema and 9,839 sq.m of retail, restaurant and cafe use. It would comprise a number of buildings ranging from four to 27 storeys around a new central square of public open space set between the High Street and existing Blenheim Centre. The development would also include parking and cycling provision.

Case history

11 GLA officers reviewed the scheme at pre-application stage where the principle of the site redevelopment was strongly supported, but further details were required in relation to housing, affordable housing, design, inclusive design, sustainable development and transport.

Strategic planning issues and relevant policies and guidance

12 The relevant issues and corresponding policies are as follows:

- | | |
|----------------------------------|--|
| • Mix of uses | <i>London Plan</i> |
| • Housing and affordable housing | <i>London Plan; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG</i> |
| • Urban design | <i>London Plan</i> |
| • Inclusive design | <i>London Plan; Accessible London: achieving and inclusive environment SPG</i> |
| • Sustainable development | <i>London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy</i> |

13 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2008 London Borough of Hounslow Unitary Development Plan and the London Plan (Consolidated with Alterations since 2011).

14 The following are also relevant material considerations:

- The National Planning Policy Framework, Technical Guide to the National Planning Policy Framework and National Planning Practice Guidance.
- The 2015 draft Local Plan
- the 2013 Hounslow Town Centre Masterplan

Mix of uses

15 The site is within Hounslow town centre and there has been a long history relating to the aims and prospects of proposed development in the area. The Hounslow Town Centre Management Plan was adopted in 2013 outlined the requirements for the site, including the delivery of 10,000 sq.m of retail floorspace, 4,000 sq.m of leisure space and high quality town centre living accommodation. The draft Local Plan maintains this as an allocated site, suitable for a leisure, commercial and residential development with car parking and draft Policy TC3 identifies a need for 23,450 sq.m of retail floorspace for Hounslow town centre as a whole.

Housing

16 The development of this site which includes residential use is in line with the requirements of London Plan Policy 3.3 which seeks increased housing supply and Policy 3.4 which seeks to optimise housing potential. It would assist in reaching Hounslow's London Plan housing target of 8,222 new homes within the plan period and bring additional development into the town centre.

Commercial

17 The scheme proposes nearly 10,000 sq.m of mixed retail commercial space. This would assist in job creation on the site, and support the existing retail offer available in the town centre.

Cinema

18 The inclusion of a cinema on this site has been a long standing aspiration for a significant amount of time. The inclusion of a leisure facility such as this would provide an anchor use within the Town Centre and would support the aims of London Plan Policy 4.6 and 4.7.

Housing

19 London Plan Policy 3.8, together with the Mayor's Housing SPG seeks to promote housing choice and seek a balanced mix of unit sizes in new developments, with particular focus on affordable family homes. The proposal provides the following mix of units:

Tenure/unit size	1 bedroom	2 bedroom	3 bedroom	Total
Private	123	155	33	311 (59%)
Intermediate	25	83		108 (20.4%)
Affordable rent	49	49	10	108 (20.4%)
Total	197 (37%)	287 (55%)	43 (8%)	527

20 This mix would provide a range of unit; however, there are very few three bedroom family units. The borough should confirm that this mix represents an identified need in the area, which can be evidenced through local data.

Affordable housing

21 Given the strategic policy afforded to maximising affordable housing delivery in London Plan Policy 3.12, any proposed affordable housing contribution should represent the maximum reasonable amount having regard to, amongst other things, affordable housing targets adopted by the borough. The 'saved' policies of the Hounslow UDP do not include the affordable housing meaning that the quantum of affordable housing required on each site will be in line with London Plan Policy. However, GLA officers realise that the borough has based its recent affordable housing assessments on the basis of the housing projections for the borough, and the affordable housing requirements across London outlined in the London Plan. This affordable target for Hounslow equates to approximately 41% of all new housing. In addition to this, the draft Local Plan Policy SC2 seeks 40% of all new housing to be affordable.

22 The submission confirms that the development would provide 41% affordable housing which would meet the aims of the draft policy and would provide a significant quantum of affordable housing within the town centre. The affordable housing provision is strongly supported.

Tenure

23 London Plan Policy 3.11 establishes a strategic tenure mix for affordable housing of 60% affordable/social rent to 40% intermediate housing, as does Hounslow's draft Local Plan Policy SC2. The scheme proposes a tenure split of 50:50, which is broadly in line with the intent of Policy 3.11.

Children's play space

24 London Plan Policy 3.6 outlines that all proposals which include housing should make adequate provision for play and informal recreation based on the expected child population generated by the scheme. GLA officers calculate that the site would yield approximately 116 children and a requirement for a total of 1,156 sq.m of play space. The planning statement confirms that 1,199 sq.m of playspace would be included in the scheme, yet the design and access statement suggests that this would be 1,160 sq.m and provide for 710 sq.m of doorstep play, 290 sq.m of local and neighbourhood play and 160 sq.m of youth play space. The provision of this space is welcomed, but further detail should be provided confirming the quantum of playspace proposed.

Density

25 The site has a PTAL ranging from 5 to 6 (on a scale from 1 -6 where 6 is the highest) and is central in character. The London Plan requires density to be considered in line with the overall quality of the development including townscape, local character, spaces between buildings and public/private amenity spaces. The London Plan density matrix (Table 3.2 in support of London Plan Policy 3.4) suggests a residential density of between 650 and 1,100 habitable rooms per hectare is suitable for a site such as this. The scheme proposals a density of 811 habitable rooms per hectare which is within the optimum range, however the applicant should confirm that this is based on the net residential area.

Tall buildings/views

26 London Plan Policy 7.7 sets out that tall buildings should be part of a plan-led approach to changing or developing an area and should not have an unacceptably harmful impact on their surroundings. The 'saved' policies from the Hounslow UDP outline that high buildings will only be granted where they meet a range of criteria, including that it relates to the site and the area, that it secures adequate setting, including landscaping and amenity space around the site and that it should comprise high quality design. The draft Local Plan Policy CC3 states that high quality tall buildings will be supported where they contribute to the regeneration and growth of that area, and specifically states that tall buildings will be focused in identified areas, which include Hounslow Town Centre.

27 The proposal includes a tall building of 27 storeys in the centre of the site. The site is within Hounslow Town Centre and has been identified as an area where a tall building would be suitable. No strategic objection is raised to the height of the building in this proposal.

28 London Plan Policy 7.11 and 7.12 establish the London View Management Framework (LVMF), which seeks to designate, protect and manage 27 views of London and some of its major landmarks and the LVMF SPG seeks to provide a method to understand and protect the characteristics. The site does not sit within any of the views outlined in the LVMF SPG. Accurate visualisations from key views identified by the Council.

29 GLA request further details on the views of the site from the high street to confirm the local impact of the proposal. This should be discussed further with GLA officers.

Urban design

30 Good design is critical to delivering the objectives of the London Plan. Its policies and supplementary guidance set out specific requirements for the design of all developments in London. Policy 3.5 of the London Plan includes requirements relating to residential design; Chapter 7 sets out policies on lifetime neighbourhoods (7.1), inclusivity (7.2), crime (7.3), character (7.4), public realm (7.5) and architecture (7.6).

31 The proposal demonstrates a clear and legible layout centred on a public square which is flanked by high levels of active frontage and a mix of uses that will encourage and support a range of activities throughout the day and evening. The proposed north-south axial link provides a strong spatial relationship with the existing Blenheim Centre while also enabling clear views towards the High Street which will assist in drawing people into the square and further contribute to the activation of other areas of proposed public realm. This is welcome.

32 Given that there is an existing desire line from Hounslow Central station towards the High Street along Alexandra Road, the applicant is advised to revisit the ground floor frontage of the cinema with the aim of optimising the pedestrian environment along this western edge. This could comprise a secondary point of public access alongside extending the scope of the landscaping strategy along the length of Red Lion Mews, designed to provide a safe and inviting pedestrian friendly route into the site. The introduction of a shared space approach along this link is supported, subject to demonstrating how the pedestrian route is physically delineated from vehicular access to ensure this route is designed to be fully inclusive.

33 The inclusion of ground floor maisonettes at the northwest corner of the site is welcomed. This will enable passive surveillance and encourage pedestrian activity on this prominent corner.

34 As discussed at pre-application stage, the perimeter block typology provides an effective means of delineating the public realm from communal amenity spaces while creating strong frontages and enclosure along the main routes and spaces. Entrances to the residential cores are well distributed across the scheme and are positioned so as to appear legible and accessible from the public realm which is welcomed. Residential quality appears to meet a high standard with the majority of units orientated to enable east/west and southern aspects while achieving acceptable core to unit ratios. It is however noted that the internal layout of block B results in nine units per floor sharing the same core and there are a number of units within the northern portions of blocks A and C with predominantly north facing aspects which is likely to be further impacted by the proximity and massing of the Blenheim Centre. These areas should be reviewed to ensure that residential quality meets the highest possible standards and is aligned with the best practice principles of the Mayor's Housing SPG. This can be achieved by the introduction of through units or the use of deck access along the northern edge of block A (as proposed within block C).

35 The form and massing strategy is broadly supported with the scale of development responding to the varying scale of the surrounding context, from the low rise buildings on the High Street to the taller and larger footprint of the Blenheim Centre. As noted above, the principle of a tall building is supported and the narrower north and south elevations of this element offer the potential to form a distinctive local landmark. Local views included in the design and access statement suggest that the broader elevation of the tower require careful consideration in order to achieve a refined, proportioned and high quality appearance.

36 It is understood that the architectural concept underpinning the tower is to create a simple and uniform appearance with the use of a singular metal-effect cladding panel system with articulation to the slender north and south edges in the form of balconies with gold-effect panelling. This creates a distinctive and playful appearance which is supported. The broader east and west elevations are less successful and while a degree of vertical emphasis is achieved as a result of the vertical run of inset balconies, there is some concern that the extent of metal panelling will result in a largely flat and homogenous appearance. The applicant is therefore encouraged to investigate ways of introducing more depth and complexity to these elevations. This could be achieved through experimenting with a more varied material palette and exploring the depth of window reveals, as has been implemented at the upper levels. Further consideration should also be given to the articulation of the tower's roofline, and there is an opportunity to increase the size of the light box to create a double height volume and create a more prominent and defined feature to denote the top of the tower. GLA officers would welcome further discussion on these points to ensure the tower is designed to achieve the highest possible standard of architecture.

Inclusive design

37 London Plan Policy 7.2 together with the Accessible London SPG aim to ensure that proposals achieve the highest standards of accessibility and inclusion (not just the minimum). Inclusive design principles, if embedded into the development and design process from the outset help to ensure that all of us, including older people, disabled and Deaf people, children and young people, can use the places and spaces proposed comfortably, safely and with dignity. The submission is accompanied by a access statement which outlines the key approach to accessibility across the site which is welcomed.

38 The submission confirms that all residential units will meet the lifetime homes criteria and 10% of units are designed to be easily adapted to meet the needs of wheelchair users. The adaptable units would be provided across a range of size and tenure of units which is welcomed.

39 The public realm proposal would incorporate level access across the site. The site would be completed with a shared surface, but would be pedestrian only. Where the site meets the surrounding roads, and around areas of play or seating, tactile paving would be used and obstructions would be clearly identified. The approach to all buildings and access will be level and all public buildings will be fully accessible.

40 The access strategy outlines that 25 car parking spaces will be accessible 'Blue Badge' bays. This would be less than the number of units proposed to be wheelchair adaptable. Further information should be provided on the management of these spaces, particularly how they will be allocated to units and how further spaces will be allocated as necessary, should the need for additional spaces arise. This detail should be contained in a submitted car parking management strategy in line with the transportation comments below.

Sustainable development

Energy

41 The applicant has submitted an energy strategy which broadly follows the energy strategy. A total reduction of 126 tonnes per annum (10%) in regulated CO₂ emissions compared to a 2013 Building Regulations compliant development would be achieved from the lean stage of the hierarchy. A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include mechanical ventilation and heat recovery systems, low energy lighting and services.

42 The demand for cooling will be minimised through external shading via balconies, solar control glazing and roller blinds. Evidence should be provided to demonstrate that the dwellings and non-domestic spaces are not at risk of overheating. Dynamic thermal modelling of sample dwellings and non-domestic areas following TM52 and TM49 guidance is recommended.

43 In relation to the clean stage, the applicant proposes a reduction in regulated CO₂ emissions of 272 tonnes per annum (25%). The applicant has concluded that there are no existing or planned district heating networks within the vicinity of the proposed development. However, there is a commitment to ensuring the development is designed to allow future connection should one become available. This should be secured through condition.

44 A site heat network is proposed. Confirmation should be provided that all apartments and non-domestic building uses, including the retail areas, will be connected to the site heat network. A drawing should be provided indicating the route of the heat network linking all buildings on the site. The network would be supplied from a single energy centre measuring 710 sq.m. The plan of the network should include more details about the location of the energy centre.

45 The applicant is proposing to install a 240kWe (172kWth) gas fired Hoval EG-240 CHP unit as the lead heat sources for the whole site heat network. The CHP is sized to provide a proportion of domestic and non-domestic hot water and space heating. Monthly load profiles and operating assumptions made should be provided to support the sizing of the system and estimated carbon savings. Information should also be provided on the proposed management arrangements for the system.

46 For the final green stage of the hierarchy the applicant investigated the feasibility of a range of renewable energy technologies and is proposing to install 550 sq.m (71.4kWp) of photovoltaics. The retail and restaurant areas will also be served by an air source heat pump (ASHP). This will achieve a reduction in regulated CO₂ emissions of 16 tonnes per annum (6%).

47 Overall, a reduction of 444 tonnes of CO₂ per year in regulated emissions compared to a 2013 Building Regulations compliant development is proposed, equivalent to an overall saving of 36%. This is welcomed, and subject to confirmation of the details outlined above, would comply with Policy 5.2.

Noise

48 London Plan Policy 7.15 states that policies throughout the London Plan will be implemented in order to reduce and manage noise to improve health and quality of life. The site is located in close proximity to the flight path for Heathrow airport and future residents are likely to experience significant noise effects as a result of this. Any mitigation required to secure acceptable living standards as a result of the location for the site, should be secured by condition or legal agreement as necessary.

Flooding

49 The site is in Flood Zone 1, with some minor elements of surface water flood risk and a potential groundwater flood rise. The submitted Flood Risk Assessment acknowledges and addresses these risks and the principle of the proposal is acceptable in terms of London Plan Policy 5.12.

50 The Flood Risk Assessment proposes a drainage strategy that will utilise a range of techniques to achieve a 50% reduction in surface water discharge. Given the nature and location of the proposals, the approach is broadly in line with Policy 5.13, but the use of green roofs and rain gardens should be considered during implementation. Detailed consideration of the surface water management should be resolved through an appropriate condition to be approved in consultation with the borough's drainage team.

Transport

Layout

51 The applicant proposes two new vehicular accesses; the access to the retail parking will be located on the north east corner of the site off Prince Regent Road with the access to the residential parking from the west. To accommodate the retail access, an existing bus stop is required to be altered and the carriageway extended. There is no objection to this change subject to the detailed design and relocation of bus stop being undertaken in line with TfL's bus stop accessibility guidance.

Car parking - residential

52 The scheme proposes 160 residential car parking spaces within the basement, with 10% as Blue Badge bays. A further 100 spaces will be re-provided for the current residents of the Blenheim Centre, as required by legal agreement, but this is not considered as part of the overall parking provision. Therefore, the parking ratio equates to 0.3 spaces per unit.

53 Local car ownership is 0.32 per household, and this quantum is not considered unreasonable. In addition, the three car club spaces at basement level, and associated car club membership for future residents (which should be secured through the Travel Plan) will further discourage car ownership.

54 The proposed electric vehicle charging points (EVCPs) will need to be increased to meet the London Plan requirement of 20% spacing with active provision and 20% with passive. In addition, the number of Blue Badge bays is below London Plan standard of providing each accessible unit with a Blue Badge space. It is nevertheless accepted that from the first day of occupation, the full provision of Blue Badge bays may not be necessary, therefore, the applicant should demonstrate that the basement is capable of accommodating the additional 53 Blue Badge bay specification to be converted as and when demand requires, as outlined above. This should be secured and monitored through the Travel Plan and a car parking management plan.

Car parking - retail

55 The proposal includes 250 car parking spaces to serve the cinema and retail units. This will also act as town centre parking and represents a 177 space reduction from the existing situation. The London Plan outlines that retail parking for a site with a PTAL of 5-6 should be for one space per 75-50 sq.m with no additional for A2-A5. On the basis that the submission confirms 70% of the floorspace would be retail, the parking provision should be between 92 and 138 spaces.

56 The Transport Assessment references the Hounslow Town Centre Parking Review (October 2014) which concluded that the town centre currently has a significant level of excess parking supply. However, the full implementation of the Local Plan would reduce parking capacity by approximately 30%, and additional development demand will exceed supply by up to 320 spaces. The review assumed 200 retail spaces provided on this site and demonstrated there would be no available capacity within the town centre on a Sunday. This is likely due to 'no tariff' on Sunday parking, and if a charge was introduced, demand would be reduced, however, TfL consider a 200 space provision to be an appropriate for the functioning of the Town Centre.

57 However, it is accepted that the current proposals do represent a reduction for the existing provision, and section 7 of the London Plan Town Centre SPG does state that parking standards should not disadvantage outer London town centres in competition with wider south east. Further discussion is therefore required to ascertain the impact on the viability and vitality of the Town Centre with the proposed reduction in retail parking.

58 Notwithstanding the quantum, the London Plan requires EVCPs to be provided for these spaces, 10% active and 10% passive. The 27 commercial Blue Badge bays are acceptable. The draft car parking management plan should be secured through condition and should outline the lease arrangements for these spaces to allow for their control and allocation across uses.

Cycling

59 The proposal includes 568 residential cycle spaces across six areas, two at ground and four in the basement. The London Plan cycle standards requires a further 289 residential spaces to be provided. In addition, the access arrangements should be clarified as the lifts do not appear to be able to accommodate cyclists and TfL would not support cyclists having to travel through more than two sets of doors.

60 For the commercial use, 21 employee cycle spaces are proposed with an additional 84 spaces in the public realm. Owing to the range of flexible uses proposed, the London Plan target would require a further 14 commercial spaces. However, TfL would encourage the applicant to safeguard the maximum provision that any approval is subject to a condition that delivers the appropriate number of cycles required upon occupation when the retailer is known. The provision of shower and changing facilities should be confirmed and further discussion is required on the location of the staff spaces which appear to be inconveniently located.

61 The site is in close proximity to the future planned cycle infrastructure along the A315 and is at the centre of a proposed Quietway alignment linking Southall to Richmond via Hounslow. The proposal will reduce existing cycle access through the site and alternative routes around the site are not appropriate due to either width restrictions or cycling bans. To improve access across the town centre and facilitate a strategic cycle route, TfL requires further discussion with the applicant on the implementation of a shared pedestrian and cycle facility through the site.

Pedestrians

62 TfL welcome the increased pedestrian permeability through the site, however, the adjacent footways are narrow and require a pedestrian comfort level assessment to be undertaken for both proposed and existing footways. A pedestrian environment review system (PERS) audit should also be undertaken along routes to local amenities, bus stops and stations. Any improvements or mitigation required, should be secured within the section 106 agreements in accordance with London Plan Policy 6.10. In addition, TfL recommends a contribution is secured towards the implementation of Legible London signage in the town centre.

Modelling

63 TfL questions the assumptions made for the education trips, particularly the low proportion of those that are accompanied by an adult and the mode share used differ to what would be expected. In addition, the applicant should provide the trip generation for the working lunch hour as it is expected this development would cater for those employed within Hounslow Town Centre.

64 The LINSIG models have not been provided to TfL for detailed analysis. These should be provided to TfL for full comment. In addition, to understand the impact on bus performance of a 63% increase in traffic along Prince Regent Road, it is required that the Alexandra Road/Prince Regent Road roundabout be modelled and the journey delay time provided. These junctions are critical to the functioning of the SRN so TfL require discussion with the applicant in relation to the model auditing process, timescales and a way forward.

Public transport

65 TfL requires further discussion with the Council on an appropriate mechanism to pool funding towards local bus improvements to mitigate the cumulative impact of this development and others on both local bus capacity and infrastructure.

66 On the basis that the development will increase the number of trips to the town centre during the evening, and in accordance with TfL's taxi ranks action plan and the Hounslow Town Centre Masterplan, further discussion is required on the location and size of a formal taxi rank.

Plans

67 A workplace and residential Travel Plan have been provided. While these are broadly acceptable, further information should be included on funding sources and how the Travel Plans will be secured. The final Travel Plans will need to be secured, enforced, monitored, reviewed and funded through the section 106 agreement to ensure conformity with the London plan Policy 6.3.

68 The three servicing bays proposed are supported by TfL; however, they may require further consideration given the options for pedestrian/cyclist routes outlined above. A draft delivery and servicing plan has been provided, but this should be updated to the freight operator recognition scheme and measures to reduce freight movements. A construction logistics plan has not been provided, but the principles are referred to in the transport assessment. This should be updated to take account of the freight operator recognition scheme. Both documents should be secured by condition for approval in consultation with TfL.

Community Infrastructure Levy

69 The Mayor has introduced a London-wide Community Infrastructure Levy (CIL) to help implement the London Plan, particularly policies 6.5 and 8.3. The Mayoral CIL formally came into effect on 1 April 2012, and it will be paid on commencement of most new development in Greater London that was granted planning permission on or after that date. The Mayor's CIL will contribute towards the funding of Crossrail

70 The Mayor has arranged boroughs into three charging bands. The rate for Hounslow is £35/sq.m. The required CIL should be confirmed by the applicant and Council once the components of the development or phase thereof have themselves been finalised. See the 2010 regulations: <http://www.legislation.gov.uk/ukdsi/2010/9780111492390/contents> as amended by the 2011 regulations: <http://www.legislation.gov.uk/ukdsi/2011/987/made>

71 London borough councils are also able to introduce CIL charges which are payable **in addition** to the Mayor's CIL. Hounslow is in the process of adopting a scheme. See the Council's website for more details.

Local planning authority's position

72 The local planning authority's position is not yet known.

Legal considerations

73 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

74 There are no financial considerations at this stage.

Conclusion

75 London Plan policies land use, housing, affordable housing, tall buildings and views, urban design, inclusive access, sustainable development and transport are relevant to this application. While the application is broadly acceptable in strategic planning terms, on balance, the application does not comply with the London Plan. The following changes, however, may remedy the current deficiencies:

- **Housing:** Confirmation of the quantum of child play space should be provided and that the density is based on the net residential area of the site.
- **Urban design:** The approach to the design of the scheme is broadly supported. Further work is required on the activation of the west edge of the cinema plot, the detail of unit layouts in block A, B, and C and the detail of the tall tower.

- **Inclusive design:** A car parking management plan should be secured in any permission which outlines how Blue Badge spaces will be allocated and managed.
- **Sustainable development:** Further details are required in relation to overheating of the proposed units. The provision of a future connection to a district heating network should be secured for all uses on site. A plan of the site heat network should be provided along with details of the proposed energy centre. Details of the sizing and management of the CHP unit should also be provided.
- **Transport:** TfL required further discussion with the applicant on the number of car parking spaces and modelling process. Further assessment is required in regards to the pedestrian environment, cycling facilities, bus mitigation and taxi rank provision. Conditions are required in relation to delivery servicing plan, construction management plan and construction logistics plan and the section 106 agreement should include the Travel Plan requirements and funding for Legible London signage.

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