

18 February 2016

Land at Chiswick Roundabout, Great West Road, Chiswick, London W4

in the London Borough of Hounslow

planning application no. P/2015/5555

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

Redevelopment of site to provide a mixed use building of one part ground plus 31 storeys and one part ground plus 24 storeys, comprising 320 residential units (Use Class C3), office (Use Class B1) and retail/restaurant uses (Use Class A1-A3), basement car and bicycle parking, resident amenities, hard and soft landscaping and with all necessary ancillary and enabling works. The application is accompanied by an Environmental Statement.

The applicant

The applicant is **Starbones Ltd** and the architect is **Studio Egret West**.

Strategic issues

The principle of a **residential-led mixed use** development, with office use and retail is in accordance with strategic objectives and is supported. The architecture, form and scale of development are acceptable, subject to further **design** details relating to public realm and architecture.

Affordable housing is proposed, however the viability appraisal is still the subject of discussion in order to demonstrate compliance with the London Plan. The overall **residential quality** is in accordance with the Mayor's standards and the high **density** nature of the scheme is acceptable. The scheme proposes a mix of **unit sizes**, but it still needs to be demonstrated that the Council's local housing needs are met, including tenure split.

The principles of the scheme in terms of **inclusive design** and the **play space** provision are acceptable, subject to further details. Further discussion regarding **energy** and **106 contributions** is also required to ensure that the scheme fully accords with London Plan.

Recommendation

That Hounslow Council be advised that while the scheme is broadly acceptable in strategic planning terms, the application does not fully comply with the London Plan, with the reasons and remedies set out in paragraph [122] of this report.

Context

1 On 7 January 2016 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 17 February 2016 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:

- *1A: Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats.*
- *1B: 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.*
- *1C: Development which comprises or includes the erection of a building in respect of which one or more of the following conditions is met: a) the building is more than 30 metres high and is outside the City of London.*

3 Once the 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 measures approximately 0.28 hectares and is a roughly triangular shaped island site bound by the A4 Great Western Road and the elevated section of the M4 Motorway flyover to the south, the A406 North Circular Road to the east and Larch Drive to the north-west with a B&Q retail store and large surface car park beyond. The site is located at the junction with Chiswick roundabout connecting all of these main arterial routes.

7 The immediate context is characterised by relatively low level light industrial, retail and office uses with residential neighbourhoods further south and east.

8 The site was historically used as part of the wider triangular site, now in part occupied by the B&Q store and car park, and was used for industrial purposes, with a prominent bank building occupying the tip of the triangle fronting the roundabout. Following the opening of the M4 flyover in 1959, the site was then used as a motor and engineering works until the 1980's when it was split to facilitate the B&Q development, with the bank building remaining on the smaller site. As part of the B&Q development, a new access road, Larch Drive, was provided

dividing the larger site in two. The bank subsequently closed and became derelict and was later demolished in 1998. The site has been derelict for over 25 years.

9 The site is located on the piece of land bound by Larch Drive, the A406 Gunnersbury Avenue, Chiswick Roundabout and the A4 Great West Road, all of which form part of the Transport for London Road Network (TLRN), in the London Borough of Hounslow. The M4 flyover (managed and maintained by Highways England) also runs above the A4 Great West Road at this point.

10 The site is located in close proximity to bus stops served by five routes (237, 267, H91, 391, 440), one of which is 24 hour, plus one night bus route (N9), offering services to a variety of destinations. Kew Bridge mainline rail station is located approximately 400m from the site and is served by South West train services to Waterloo and Weybridge. The nearest London Underground (LU) station is Gunnersbury, located approximately 500m from the site. This is served by the District Line, as well as London Overground services to Richmond and Stratford. Hence the site has a public transport access level (PTAL) of 4, classified as good on a scale of 1a to 6b, where 6b is highest.

Whilst the site has no formal designations, it is located within the Great West Corridor, on a stretch of the Great West Road known as the 'Golden Mile', reflecting its important economic function. The Council's Local Plan identifies the Great West Corridor (where the Golden Mile is located) as having capacity for change and growth in homes and jobs with new infrastructure over the plan period, with the Golden Mile becoming an employment-led mixed use corridor connecting to the significant commercial district to the east. As such it is currently identified in the London Plan as a Strategic Outer London Development Centre and in Hounslow's Local Plan as a potential Opportunity Area. The site does not lie within a conservation area and there are no listed buildings within 500 m of the site. Development of a tall building on the site does, however have the potential however to affect the setting of a number of heritage assets.

11 The area has been subject to a number of recent major applications, notably outline consent was granted for the redevelopment of Brentford Football Club to provide a new stadium and up to 910 residential units, a hotel and retail floorspace. It is understood that other nearby sites are also likely to come forward for development including the B&Q site directly to the north of the application site.

Details of the proposal

12 Full planning permission is sought for the mixed use development of the site. The application seeks full planning permission and advertisement consent to provide a mixed use building ranging in height between 18, 26 and 33 storeys (including amenity roof levels), comprising 320 residential units (Use Class C3), office (Use Class B1) and retail/restaurant uses (Use Class A1/A3) with four digital advertisement displays.

13 The 320 residential units comprise: 29 x studios (9%); 137 x 1 bed (43%); 98 x 2 bed (31%); 51 x 3 bed (16%); and 5 x 4 bed (1%). The residential proposals include 96 affordable units (30%) which comprise 9 x studios (9%); 39 x 1 bed (41%); 26 x 2 bed (27%); 17 x 3 bed (18%); and 5 x 4 bed (5%) all of which are intermediate.

14 The non-residential uses include 4,608 sq.m (GIA) of flexible office floorspace tailored around a co-working concept to cater for Small to Medium Enterprises (SMEs), but adaptable to single tenants. This space is located on 2nd, 3rd, 4th and 5th floors arranged around a core of communal space. 498 sq.m of flexible retail / cafe floorspace (Use Class A1/A3) is located on the ground and first floor level of the building. The retail / café floorspace is provided within two areas and has been designed to be flexible.

15 The development provides new public realm within the application boundary, including a new arrival space, improved footpaths and cycleways and a new internal garden space. Communal external amenity spaces are located on the 5th, 25th and 32nd floors. At level 5, there will be 354sqm of amenity space provided for the residential dwellings and 142sqm for the office workers. In addition 470 sq.m of communal internal amenity space will also be provided for the residential units at this level. At level 32, amenity space will be provided which will be made accessible to the public as a viewing platform for 10 days, or other period to be agreed, in any given year. Individual residential units are provided with winter gardens.

16 Vehicular access into the Site's underground parking is located on the northern edge of the Site, providing access via a vehicular ramp from Larch Drive. The basement levels provide car, motorcycle and cycle parking, space for refuse, plant, switchrooms and substations. The development will provide 82 car parking spaces (72 for residential uses, 8 for office uses and 2 car club spaces), 17 motorcycle spaces and 548 cycle parking spaces (484 for the residential element, 62 for office uses and 2 for the retail / cafe).

17 The majority of car parking spaces will be provided within an automated car parking system, whilst 4 will be provided at basement level 1, providing 2 spaces for the office floorspace and 2 car club spaces (all with electric charging provision). Overall, 95% of the spaces will be provided as wheelchair spaces, with all automated spaces being passive charging provision, of which (in total) 40 of the 82 spaces will have an electric charging provision, amounting to 49%. The development includes a loading bay along Larch Drive for receiving deliveries and for the collection of waste and recycling.

18 The development also comprises a number of illuminated digital displays for advertisement purposes on the building. These will face onto the M4, Great West Road, Gunnersbury Avenue and Chiswick Roundabout. The advertisements will be provided as a mesh and will be integrated within the building design.

Case history

19 A number of development proposals have been pursued over the site's 25 year history. In January 2000, the Council resolved to grant planning permission for a 26 storey (119 metre) high building comprising office accommodation, known as The Pinnacle, but the permission was called in by the Secretary of State and later withdrawn. Following that, planning permission was granted in September 2002 for a 13 storey building (59 metres), known as The Citadel, and comprising 19,750 sq.m of offices with basement car parking. Work commenced to implement the permission, and the Council confirms that this permission is extant. The latter application was referred to the previous Mayor who, on 19 February 2002, and following a series of amendments, advised Hounslow Council that the proposal for a tall office building was supported in strategic term subject to exemplary design detailing.

20 In 2012, planning permission was granted for a 10 storey building (50 metres), known as The Octopus, comprising office, retail and outdoor advertising uses. Various iterations of this scheme were referred to the Mayor between 2006 and 2012, who, despite the unusual design with LED advertisement hoarding on the building's facade, broadly supported the land uses principle and design. Despite extensive marketing, it has failed to attract sufficient occupier demand due to the lack of interest in long term investment from the advertising industry.

21 On 27 November 2014, a pre-planning application meeting was held with GLA officers and the applicant for a proposal for a mixed use development within a 42 storey building (140 metres) comprising approximately 4,170 sq.m of office floorspace, 140 bedroom hotel and approximately 410 residential units, together with a five level basement with up to 150 parking spaces. On 12 December 2014, GLA officers provided written advice on the proposals stating that whilst the principle of a mixed use development and a tall building was broadly supported, strategic concern was raised with the design, layout, height and mass of the scheme. In particular, GLA officers questioned whether the quantum of land uses proposed and the conflicts that arise could successfully co-exist on this site so heavily constrained by major road infrastructure.

22 On 10 November 2015 GLA officers hosted a further pre-application meeting with the applicant for a proposal for a mixed use development within a building ranging in height between 18, 26 and 33 storeys in height (including amenity roof levels), where the residential led mixed use redevelopment of the site was supported. The design and height was also supported subject to further detail on residential quality, playspace, and views analysis to understand the impact on Kew World Heritage Site. Further work and discussion was required on the proposals for affordable housing, and the transport aspects and energy requirements raised by the development. Further detail was also required on inclusive access within the design and access statement to be submitted with the application.

Strategic planning issues and relevant policies and guidance

23 The relevant issues and corresponding policies are as follows:

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| • Land use principles | <i>London Plan; the Mayor's Economic Development Strategy;</i> |
| • Housing, affordable housing | <i>London Plan; Housing SPG; draft interim Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context, SPG</i> |
| • Density | <i>London Plan; Housing SPG</i> |
| • Urban design | <i>London Plan; Shaping Neighbourhoods: Character and Context, draft SPG; Housing SPG; draft interim Housing SPG; London Housing Design Guide; Shaping Neighbourhoods: Play and Informal Recreation SPG</i> |
| • Tall buildings/views | <i>London Plan, London View Management Framework SPG</i> |
| • Inclusive design | <i>London Plan; Accessible London: achieving an inclusive environment SPG;</i> |
| • Sustainable development | <i>London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy</i> |
| • Transport and Parking | <i>London Plan; the Mayor's Transport Strategy</i> |
| • Ambient noise | <i>London Plan; the Mayor's Ambient Noise Strategy;</i> |
| • Air quality | <i>London Plan; the Mayor's Air Quality Strategy; Control of dust and emissions during construction and demolition SPG</i> |
| • Equal opportunities | <i>London Plan; Planning for Equality and Diversity in London SPG; Equal Life Chances for All (Mayor's Equalities Framework); Equalities Act 2010</i> |
| • Access | <i>London Plan; Accessible London: achieving an inclusive environment SPG;</i> |
| • Biodiversity/Geodiversity | <i>London Plan; the Mayor's Biodiversity Strategy; Preparing Borough Tree and Woodland Strategies;</i> |

- CIL

London Plan; Mayoral Community Infrastructure Levy

24 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plans in force for the area are the Hounslow Local Plan (adopted September 2015) and the London Plan 2015 (Consolidated with Alterations since 2011).

25 The following are also relevant material considerations:

- National Planning Policy Framework, Technical Guide to the National Planning Policy Framework and National Planning Practice Guidance;
- Draft Minor Alterations to the London Plan (2015).

Land use principles

26 Whilst the site has no formal designation in either the London Plan or Hounslow's Local Plan, it falls within the area known as the Great West Corridor in the Local Plan, where employment-led growth in jobs and homes is envisaged. The Local Plan indicates that the area around Chiswick roundabout (where this site is located) should be transformed connecting the beginning of the Golden Mile to Chiswick Business Park. The Local Plan refers to the Golden Mile Corridor as an emerging Opportunity Area, which the Mayor will consider when a full review of the London Plan commences in 2016. London Plan Policy 2.16 also identifies Hounslow's Great West Corridor as a Strategic Outer London Development Centre (SOLDC) for media.

27 Hounslow Council have commenced work on the Great West Corridor Plan, which through a partial Local Plan review, will identify the extent of the growth area supporting the media and digital sectors in line with the area's identification as a SOLDC in the London Plan. It will also progress the designation of the Great West Corridor Plan as an Opportunity Area, and furthermore, it will coordinate the delivery of public and private investment in transport infrastructure throughout the corridor, as identified in the Local Plan.

28 In addition to the policy context outlined above, the planning history of the site, as set out in paragraphs 20 and 21, has established the land use principles for the site, and so the principle of the office, ancillary retail/gallery and residential uses in this location within the Great West Corridor is supported from a strategic perspective.

29 London Plan Policy 3.3 seeks to increase London's supply of housing and in doing so sets borough housing targets; Hounslow's target is 822 additional homes per year between 2015 and 2025. The proposals would contribute significantly to this target which is supported.

Housing

30 London Plan policy 3.3 identifies the pressing need for more homes in London, setting a London-wide housing delivery target of 42,389 additional homes per year up to 2021. Table 3.1: 'Annual average housing provision monitoring targets 2011 – 2021' sets out each borough's minimum 10 year target and annual monitoring target for housing supply.

31 The Development would provide the following mix of residential units:

Unit Type	Market		Affordable (Intermediate)		Total	
Studio	20	9%	9	9%	29	9%
1 Bed	98	44%	39	41%	137	43%
2 Bed	72	32%	26	27%	98	31%
3 Bed	34	15%	17	18%	51	16%
4 Bed	-	-	5	5%	5	1%
Total	224	100%	96	100%	320	100%

32 As mentioned above Hounslow's target is 822 additional homes per year between 2015 and 2025 and the proposal for 320 new residential units would contribute approximately 39% towards this target, which is welcomed.

Affordable Housing

33 London Plan policy 3.12 requires borough councils to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes. In doing so each council should have regard to its own overall target for the amount of affordable housing provision. This target should take account of the requirements of London Plan policy 3.11, which include the strategic target that 60% of new affordable housing should be for social rent or affordable rent and 40% for intermediate rent or sale.

34 Policy SC2 of the Local Plan sets a strategic borough wide target of 40% of all new housing as affordable. The policy also seeks to deliver a mix of 60% social or affordable rent and 40% intermediate rent or sale, although it is acknowledged that this will vary on a scheme by scheme basis depending on available funding sources and circumstances that will be demonstrated in the financial viability assessment.

35 Policy 3.12 is supported by paragraph 3.71, which urges borough councils to take account of economic viability when estimating the appropriate amount of affordable provision. Paragraph 3.75 highlights the potential need for re-appraising the viability of schemes prior to implementation in order to take account of economic uncertainties and ensure that maximum public benefit is secured over the period of the development.

36 The development is proposed to deliver 96 affordable housing units (30%), which equates to approximately 31% by habitable room. The affordable housing offer is comprised entirely of intermediate units. The applicant has submitted a viability appraisal in line with London Plan policy 3.12 in order to demonstrate that the level of affordable housing provision is the maximum reasonable amount the scheme can deliver. The viability appraisal surmises that with the proposed level of affordable housing the proposed scheme actually falls short of being viable based upon current day costs/values. It states that values would need to rise by approximately 11% (in absence of any cost growth) to close the current viability gap.

37 The applicant's viability appraisal is now currently being independently assessed by consultants, on behalf of the Council. The independent assessment should be shared with GLA officers before the Mayor considers this application again, in order to assess compliance with London Plan policy 3.12, notably that the maximum reasonable amount of affordable housing is being achieved.

38 The proposed affordable housing provision is composed entirely of intermediate units, although limited detail is provided on the form of intermediate unit proposed and whether this includes intermediate rented as well as shared ownership. While GLA officers acknowledge that providing affordable rented units within a tall, mixed tenure building can be problematic due to management issues and costs related to service charges, based on the information available the proposed tenure split does not comply with London Plan Policy 3.11. Alternative scenarios should be tested and details provided prior to Stage 2. Further discussions between the GLA, applicant and Council officers would be expected in order to agree the tenure mix which is most suited to meeting local housing need.

Housing mix

39 London Plan policy 3.8 requires new developments to offer a range of housing choices, in terms of sizes and types, taking account of the housing requirements of different groups and the challenging roles of different sectors, including the private rented sector. Policy SC3 of the Local Plan provides a housing mix as the starting point for consideration of all housing proposals, which is summarised in the table below as it relates to the proposed development:

Tenure	One bedroom (proposed)	Two Bedroom (proposed)	Three bedroom (proposed)	Four bedroom + (proposed)
Market	30% (53%)	40% (32%)	25% (15%)	5%
Intermediate	35% (50%)	40% (27%)	16% (18%)	9% (5%)

40 The proposed residential accommodation comprises a range of unit sizes from studio to four bed flats with more than half of the units proposed being 1 bed or studio units. It is noted that while both the market and intermediate dwelling mix are broadly in line with the housing mix provided by Policy SC3, the proportion of 1 bed and studio units is relatively high. The Council should confirm that the proposed mix reflects its own housing requirements, its understanding of local demand and the constraints of the site.

Residential Quality

41 London Plan Policy 3.5 promotes quality in new housing provision and sets out minimum space standards at Table 3.3. As of 1 October 2015 the Government's technical housing standards came into effect. The Mayor intends to adopt the new technical guidance through a minor alteration to the London Plan. In advance of this the Mayor has released a policy statement setting out that from 1 October 2015 the relevant London Plan policy and associated guidance in the Housing SPG should be interpreted by reference to the nearest equivalent new national technical standard.

42 The Design and Access statement provides information on the residential design including privacy and daylight studies, aspects and typical apartment layouts. This information demonstrates that the layout and design of the development allows for a large proportion of dual aspect residential units. Where single aspect units are proposed they are not north facing. Internally, all units surpass the overall minimum unit floor area, the minimum internal room space standards and are provided with good storage space. Generally the cores are accessible to no more than eight residential units on each floor, although on levels 13 to 16 one of the cores is accessible to 9 units. In this instance this is considered acceptable due to the open and naturally lit design of the residential corridor, which also provides opportunity for natural ventilation.

43 The sites location adjacent to the M4 and other major highways creates a challenging environment for residential use. The design of the building responds to this environment in a number of ways. Residential accommodation will only be on the sixth floor and higher. This is effective at reducing exposure to high pollutant concentrations. While noise exposure is also reduced at higher levels, background noise levels remain high especially for units facing the M4. The exterior of the building will be constructed with a capless curtain wall system, which can be specified to provide good levels of acoustic performance. Details of the design and specification of the external façade should be secured by condition to ensure that good resting and sleeping conditions are achieved.

44 With regards to external amenity provision, all units have an internal winter garden of at least 5sq.m. These winter gardens will be behind the thermal line of the building for flexibility use and also provide acoustic protection. In addition the development provides large communal roof terraces for residents, positioned so as to reduce background noise levels.

Children's Play Space

45 Based on the Mayor's playspace SPG, 28 children are predicted to live in the development, of which 16 would be under the age of 5. This gives rise to a total child playspace requirement of 283 sq.m. The proposed playspace strategy includes a series of interior and exterior play spaces spread throughout the 5th floor. A total of 752 sq.m of playspace will be provided of which 345 sq.m would be external playspace. The generous provision of playspace exceeds the minimum requirement by a substantial amount, which is welcomed. GLA officers consider the location and design of the play space to be a good response to the hard external environment of the site. The play space proposals suggest a high specification of bespoke design and this should be secured by condition.

Density

46 London Plan Policy 3.4 requires development to optimise housing output for different locations taking into account local context and character, design principles set out in London Plan Chapter 7 and public transport capacity. Table 3.2 provides the density matrix in support of this policy. Based on the characteristics of the location set out in paragraphs 3-6, the site could be regarded as having an 'urban' setting with a moderate PTAL rating. However the Council's aspirations are to create a central setting through an opportunity area, and subject to high quality design and other indicators, GLA officers could support this aspiration.

47 Based on its current 'urban' setting, the matrix suggests a residential density in the region of 200-700 habitable rooms per hectare, and for a 'central' setting the density range suggested is 650-1,100. The net residential density of the proposed development is 3442 habitable rooms per hectare. The development therefore represents a high density development in the form of a tall, building with two residential cores on a constrained site.

48 As set out above the development is considered to provide a high standard of residential design, providing a broadly appropriate mix of well-designed units with sufficient play and amenity space. As discussed further below, at a local level, the development of this island site surrounded by highway infrastructure is able to set its own context without causing harm to surrounding buildings. The impact of the development upon the wider setting has also been carefully considered, as discussed further below. Based on the above the density of the development is considered acceptable. In accordance with the Mayor's Housing SPG, the applicant and the Council should ensure that the necessary social and transport infrastructure contributions are secured to mitigate the impact of the high density development.

Tall buildings, heritage and urban design

Principle of a tall building

49 London Plan Policy 7.7 relates to the location of tall buildings and their design. It requires tall buildings to be generally limited (but not exclusively) to sites within the CAZ, opportunity areas, areas of intensification or town centres and have good access to public transport. The policy sets out a number of criteria for assessing proposals for tall buildings, which GLA officers have taken into consideration in the assessment of the proposals and the Townscape, Heritage and Visual Impact Assessment (THVIA) submitted in support of the application.

50 The site is within the area known as the Great West Corridor, which is identified in the London Plan as a potential new Opportunity Area. The Council is exploring this possibility and in accordance with Local Plan policy SV1 will seek to explore and identify capacity for additional development through a partial Local Plan review. The partial Local Plan review will include further urban design work to identify sites with suitability for tall buildings. Whilst this work is not complete, the current planning framework establishes that the site is within an area suitable for tall buildings.

51 The site itself has no grain, scale or height, in the usual townscape sense, given that it is an empty site. The surrounding area has a coarse existing urban grain of commercial buildings set in space and large scale road infrastructure. The pedestrian experience at present is one of significant physical and visual barriers, dominated by wide roads. Overall the immediate context does not provide positive features for the development of the site to relate to and GLA officers consider that the development of a high quality tall building with public realm enhancements could have a positive impact on the immediate area.

52 GLA officers acknowledge that the location of the site as a bookend to the 'Golden Mile' provides an opportunity for a 'landmark' building that is taller than the contextual height and for a high density development. Regard has also been given to previous consents for buildings on the site that are taller than the immediate context, albeit the proposed development is considerably taller than the previous consents. A tall building will act as a marker for an important traffic node in the harsh urban environment and on the West London skyline. Based on the above it is considered that the principle of developing a tall building on the site is acceptable subject to further consideration of the design of the building and its impact upon heritage assets and the wider townscape as discussed below.

Impact on designated heritage assets

53 The site is not located within a conservation area and there are no listed buildings within 500m of the site. However, development of a tall building on the site does have the potential to affect the setting of a number of designated heritage assets including conservation areas, listed buildings and the Kew Gardens World Heritage Site. Consideration has been given to the views contained within the THVIA to understand the effect upon heritage assets in the surrounding area and in particular the World Heritage Site.

54 London Plan Policy 7.8 'Heritage Assets and Archaeology' states that development should identify, value, conserve, restore, re-use and incorporate heritage assets where appropriate. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should "have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses" and in relation to conservation areas, special attention must be paid to "the desirability of preserving or enhancing the character or appearance of that area".

55 The NPPF states that when considering the impact of a proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation, and the more important the asset, the greater the weight should be. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting. Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

56 In relation to listed buildings Section 66(1) of the Planning (Listed Buildings And Conservation Areas) Act 1990 contains the following duty: "In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses."

57 The proposed development would be significantly taller than the surrounding townscape and it will be visible from the lower height and scale residential townscape of Chiswick on the south and east sides of the roundabout, which includes the Thornby Hedge, Wellsley Road and Strand on the Green conservation areas. Although tall in its context, the scale of the development is broken down first into separate volumes, each of which are broken down further by steps within each volume. The façade detail breaks down the scale further with individual elements that provide texture and depth to each of the elevations. GLA officers have considered the views provided in the THVIA submitted in support of the application and consider that although the development will be highly visible in these areas its effects can be successfully addressed by its design. In conservation areas further to the south and east the visual effects of the development reduce quickly with distance. Whilst it is highly visible from Chiswick Bridge, the sculpted massing creates an interesting marker within a view an expansive view created by the scale of the river in the foreground and skyline behind.

58 The development will be visible from Brentford to the north and east, which includes the Gunnersbury Park Conservation Area and Kew Bridge Conservation Area. The proposed development will be apparent, being visibly taller than the trees, in several long distance views within the Gunnersbury Park Conservation Area. In several views the development will add to a backdrop of existing tall buildings along the Golden Mile and consented development including the Brentford FC scheme. Where it is seen in isolation, such as from Gunnersbury Cemetery, the design of the development breaks down its scale and introduces an interesting object into views. Further to the west in the Brentford area the visual effects reduce quickly with distance. The development will be visible from the mouth of the River Brent within the St Pauls Brentford conservation area, where it is massing and form responds to the natural environment to create a positive addition to the view.

59 Within the London Borough of Ealing to the south the proposed development will be visible from a riverside view (view 12), which is within the Kew Green conservation area but outside the Kew Green World Heritage Site and buffer zone. In this view the development rises above part of the Strand on the Green Conservation Area and a group of Grade II listed houses which front directly onto the Thames. Based on the visibility of the development and its position within an open and historic townscape, GLA officers consider that the effect of the development results in harm to heritage assets, including the character of the conservation areas and settings of the listed buildings. The sculpted form and massing seeks to address this effect and the delivery of a building of the highest architectural quality could further address this harm, which will have a bearing on whether the harm is substantial or less than substantial. Further information is required, as discussed in paragraph 69, to ensure that the development delivers the highest standard of architecture. In accordance with the NPPF any harm arising to designated heritage assets will need to be weighed against the public benefits delivered by the proposal.

60 The site is located approximately 1km to the north-east of the principle northern boundary of the Kew World Heritage Site. Due to the height of the proposed development and open nature of the World Heritage Site, the development will be visible from within its boundary and buffer zone. World Heritage Sites are places of Outstanding Universal Value to the whole of humanity and the effect of the development is a key strategic consideration. London Plan Policy 7.10 on World Heritage Sites states that 'development should not cause adverse impacts on World Heritage Sites or their settings (including any buffer zone). In particular it should not compromise a viewer's ability to appreciate its Outstanding Universal Value, integrity, authenticity or significance'. London's World Heritage Sites SPG offers further guidance on settings, which has also been taken into consideration.

61 The THVIA submitted in support of the application analyses a number of key views within the WHS and its buffer zone. These views show that due to its distance the proposed development will not be highly visible or create an obtrusive feature within the landscape. The development is largely obscured by trees or existing buildings in many of the views. Where it is more visible, such as in views of the Orangery and from the riverside, the foreground tends to be broken up by trees and other landscape elements and the development forms part of a background setting that includes existing elements of the city. The proposed development will not affect principal views or setting elements of any of the iconic architectural Kew buildings including the Palm House, as shown in the THVIA. However, given the importance of preserving the Outstanding Universal Value of the World Heritage Site, GLA officers would welcome further detailed discussion around the selection of the submitted views in order to be satisfied that the assessment is complete and thorough.

62 The proposed development will be more readily visible from Kew Green, as shown in View 21 of the THVIA. This view is not taken from within the World Heritage Site itself but from within its buffer zone, which also forms part of the Kew Green Conservation Area. The proposed development rises above the coherent and lowrise roofline of the perimeter buildings around Kew Green, which include Grade II listed buildings and locally listed buildings. The THVIA states that the position of this view was judged to be the view most exposed to the development and an additional view (View 21A) does show the development partially obscured by trees. Further information and discussion is required to confirm that this is the case.

63 Overall the statement of Outstanding Universal Value recognises that development outside of the buffer zone may threaten the setting of Kew Gardens. Whilst Kew Gardens' immediate surroundings are domestic, existing high rise development in Brentford and along the A4 provide tangible evidence of its urban context. Due to the distance of the development it is largely obscured by the landscape of the Gardens and where it is more visible it forms part of the existing urban context. Based on the information contained within the THVIA the development does not appear to compromise any aspect of its Outstanding Universal Value. However, further information and discussion is required in relation to the selection of the views within the WHS and the impact upon Kew Green.

64 Overall the proposed development of a high quality tall building on the site could deliver regeneration, provide public realm enhancements, and contribute to the legibility and permeability of the area. Whilst acceptable in the large majority of views provided, GLA officers consider that the proposals does result in some harm to designated heritage assets. The delivery of a landmark building incorporating high architectural standards would help to address any harm and preserve or enhance the character, appearance or setting of designated heritage assets in the surrounding area. Further detail is required however (as set out in paragraph 74 of this report) to ensure that the development delivers a building of the highest architectural quality. The Council and GLA officers will need to be satisfied that the proposals deliver public benefits that outweigh any harm to heritage assets.

Layout and public realm

65 As discussed above the characteristics of the area around the site creates a poor public realm and challenging environment for pedestrians and cyclists. The redevelopment of the site provides an opportunity to deliver improvements to landscaping and public realm in and surrounding the site.

66 An external public arrival space is proposed in the southern part of the site. The landscape strategy seeks to utilise stepped forms and planting beds around the perimeter of the space to provide containment and a physical barrier from the roundabout. The space is partly covered by the building which incorporates a double height cantilever. The applicant has responded to comments made by GLA officers at pre-application stage by strengthening the curve of the building above this space, which is welcomed.

67 The arrival space leads into an indoor garden provided within a double height internal atrium. This space provides an extension of the public realm and a new route through the site from south to north. The space acts as the main entrance to the office floorspace and provides secondary access to one of the residential lobbies. Retail uses provide activity, which is welcomed. The success of the internal garden as a through route and as a public space will rely upon the layout, design and use/management of the space. The layout and design of the space is not considered to be entirely resolved and further detail should be provided, prior to consideration at stage 2, including the ground floor façade and entrance design and the interaction of different uses, specifically the secure line of the office. The management and public accessibility of the space should be secured by condition.

68 Along the Great West Road and the North Circular Road the proposed development indicates landscaping works to improve the pedestrian and cyclist environment. These works fall outside of the applicant's ownership and would need to be delivered through section 278 agreement with TfL, as discussed further in the Transport section of this report. The relationship between the ground floor footprint of the building and ownership boundary is not clear from the submitted drawings and should be clarified prior to consideration at stage 2 to ensure that the development delivers satisfactory enhancement to the public realm and cyclist/pedestrian environment

69 On Larch Drive improvements are proposed that include the formation of a new pedestrian footway within the part of the site that appears to be in the applicant's ownership. The proposed public realm on Larch Drive is compromised, to a degree, by the ground floor layout of the development. The frontage is dominated by back of house uses, including the refuse store on one corner and car park smoke vent shaft on the other; it also accommodates the car park entrance and loading bay. While improvements to Larch Drive have the potential to enhance the setting of the development, further details and discussion is required to ensure that the improvements deliver real benefits and do not compromise safety.

70 The wind microclimate study indicates that mitigation is required as part of the landscape strategy to ensure a suitable pedestrian environment. Mitigation includes the planting of 8 metre tall trees and provision of screens and canopies. Conditions should secure the required mitigation, including tree planting of suitable size and maturity.

Massing

71 The proposed development has been divided into three sculpted volumes in order to break down the massing. The applicant responded to comments made by GLA officers at pre-application stage to better define these volumes. The gap between the towers has been made stronger by pushing back the line of the bridging section. The profile of the eastern tower has also been reinforced to strengthen this contrast. On the southern elevation, the curve of the entrance podium has been strengthened, and the mass has been stepped six stories in part on the western tower and increased in part of the eastern tower by two stories which effectively increases the gap between the towers. GLA officers consider that the sculpted volume assists in breaking up the mass and could deliver an interesting building of high architectural quality.

Architecture

72 As discussed above the massing design principles rely on three individual building volumes to break down the overall massing and create a composition. Although each volume has been sculpted, this alone is not sufficient to contrast the volumes as they merge into one another. The applicant proposes five facade types that incorporate a combination of vertical and horizontal fins, wedge shaped balconies and feature coloured glass. The vertical fins and coloured glass will be of varying tones to provide greater contrast between the volumes and create texture and movement within the façade.

73 Whilst the concept of the architecture is understood, it is considered that a further level of refinement and detail is required to ensure that the building is of the highest architectural standard. A more detailed study of each façade type should be provided to understand the compositional arrangement and placement of the various features within each type. Further detailed elevations and sections should be provided of typical elevation bays to ensure that the architectural concept can be properly executed and survive the rigours of detailed design. The façade design should be related to the internal residential layouts, which should be shown on each floor.

Advertising

74 The location of the site along a commuter route with several prominent advertising screens and landmark advertising structures is acknowledged. The proposed development includes four digital screens which are integrated into the façade design on the office levels. The proposed advertisements raise no strategic issues in terms of visual amenity, although safety concerns discussed in the transport section must be addressed.

Inclusive design

75 The application is accompanied by an access statement that assesses public realm, approach routes, car parking and drop-off, communal and private entrances and residential and commercial layouts to ensure compliance with relevant legislation.

76 The applicant has confirmed that 32 units (10%) would be wheelchair accessible or adaptable and would be located across the development in a range of unit sizes and tenure, in accordance with the London Plan. Lift access is provided to all blocks. Typical floor plans and information setting out how the residential units would meet wheelchair housing standards have been provided, which is welcomed. The proposed development provides 82 car parking spaces of which 78 (95%) are accessible. Conditions and/or section 106 legal agreement should secure these commitments.

Climate change mitigation

77 The applicant has submitted a statement, setting out its commitments to sustainable development. The applicant has broadly followed the energy hierarchy. Sufficient information has been provided to understand the proposals as a whole, although further information is required as discussed below.

Be lean

78 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 low energy lighting and mechanical ventilation with heat recovery.

79 The applicant has undertaken an overheating analysis using the CIBSE TM52 methodology and the CIBSE TM49 weather files. The strategy for reducing the risk of overheating is through the inclusion of solar control glazing, internal blinds and external shading through overhangs and fins. The applicant has also assessed future weather scenarios, this welcomed. The results of the analysis indicate that the CIBSE recommendations can be met with the proposed strategy. The applicant is proposing that the some residential units are provided with mechanical cooling. As the overheating assessment suggests that the units may not overheat, the applicant should consider omitting the air conditioning in order to maximise the carbon savings.

80 The applicant should provide evidence of how policy 5.9 has been addressed in the non-domestic building uses to minimise cooling demand. The BRUKL document provided shows that all of the areas assessed will not meet the Part L Solar Gain limit. The applicant should incorporate further passive measures in line with Policy 5.9 in order to ensure that all areas meet the solar gain check.

81 The development is estimated to achieve a reduction of 46 tonnes per annum (9%) in regulated CO₂ emissions compared to a 2013 Building Regulations compliant development through the first element of the energy hierarchy.

Be clean

82 The applicant has carried out an investigation and there are no existing or planned district heating networks within the vicinity of the proposed development. The applicant should, however, provide a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available.

83 The applicant is proposing to install a site heat network. However, the applicant should confirm that all apartments and non-domestic building uses will be connected to the site heat network. A drawing showing the route of the heat network linking all buildings on the site should be provided. The site heat network will be supplied from a single energy centre. Further information on the floor area and location of the energy centre should be provided.

84 The applicant is proposing to install a 100 kW_e gas fired CHP unit as the lead heat source for the site heat network. The CHP is sized to provide the domestic hot water load, as well as a proportion of the space heating (50% of the total heat load). A reduction in regulated CO₂ emissions of 93 tonnes per annum (18%) will be achieved through this second part of the energy hierarchy.

Be green

85 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 174 m² of Photovoltaic (PV) panels on the roof of the development. A roof layout drawing has been provided.

86 The applicant is also proposing Air Source Heat Pumps (ASHP) to provide space heating and cooling to the non-domestic building uses. In line with the energy hierarchy, the applicant should demonstrate that the use of CHP has been optimised before considering the use of renewable technologies.

87 A reduction in regulated CO₂ emissions of 39 tonnes per annum (7%) will be achieved through this third element of the energy hierarchy.

Summary

88 Based on the energy assessment submitted at stage 1 a reduction of 178 tonnes of CO₂ per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 34%.

89 The on-site carbon dioxide savings fall short of the targets within Policy 5.2 of the London Plan. While it is accepted that there is little further potential for carbon dioxide reductions onsite, in liaison with the borough the developer should ensure the short fall in carbon dioxide reductions, equivalent to 5.8 tonnes of CO₂ per annum, is met off-site.

Flood risk and sustainable drainage

90 The <1ha site is within Flood Zone 1 and is at low risk of significant surface water flooding. The submitted Flood Risk Assessment (FRA) & Drainage Strategy acknowledges that “Any runoff entering the Site from Larch Drive could enter the Site access and flow towards the lower development levels.” As a result, the FRA and Drainage Strategy recommends that ACO drains are installed at the vehicular site access point from Larch Drive, with pump sumps incorporated into the basement. It is also recommended that basements are tanked and that finished floor levels are raised a minimum of 150mm above surrounding ground levels. These measures should be secured via appropriate planning conditions, to ensure that the development proposals will comply with London Plan policy 5:12.

91 The FRA and Drainage Strategy proposes that runoff for all storms up to the 1:100 year + 30% climate change event will not exceed 5.0 l/s. This will be achieved via a 81m³ underground attenuation tank. In addition, rainwater harvesting features will be incorporated into at roof and ground level. It is also proposed to include dual-purpose planters, with overflow discharging into the attenuation tank.

92 Floodwater from extreme events would follow the local topography and flow south east of site onto an area of public open space (presumably over the road to Chiswick roundabout). Whilst this approach is in principle acceptable in terms of London Plan Policy 5:13, the detailed design of the attenuation tanks needs to consider the guidance provided in Susdrain’s factsheet on attenuation storage for redeveloped sites:

(http://www.susdrain.org/files/resources/fact_sheets/01_15_fact_sheet_attenuation_for_redeveloped.pdf) Method 2 (i.e. with an overflow into the drainage system for runoff in excess of the storage volume) should be utilised, to allow for longer retention for lower return period storms. The applicant should confirm this approach prior to any Stage 2 referral to the Mayor.

93 The proposed development includes roof gardens and terraces. These should be designed to maximise rain water attenuation (e.g. by incorporating blue roofs components, or by using stored rainwater for irrigation purposes).

94 The proposed development is compliant with London Plan policy 5.12 (Flood Defence). However, the sustainable drainage strategy must provide further information in relation to the attenuation tank design in order to comply with London Plan Policy 5.13 (Sustainable Drainage).

Air quality

95 Dust and emissions during the construction phase have been qualitatively assessed using IAQM guidance 2014. There was found to be a low risk of construction dust effects and mitigation measures are recommended accordingly in order to reduce impacts to negligible significance. A Construction Environmental Management Plan (CEMP) should be secured by condition. The CEMP will need to ensure that NRMM used in the construction phase meet the relevant GLA standards, as discussed in Appendix 7.7 of the Environmental Statement.

96 It is stated that the combustion plant within the proposed development will comply with the relevant emission standards. Ultra-low NO_x boilers (<40 mg NO_x kWh⁻¹) will be installed, and abatement (95% catalytic reduction) of NO_x emissions will be applied to the CHP (to achieve an emission rate of <95 mg NO_x Nm⁻³).

97 The combined road traffic and energy plant air quality impacts without mitigation on existing sensitive receptors are judged to be not significant and therefore negligible. Predicted pollutant concentrations at residential receptor locations within the Proposed Development are predicted to be below the AQOs as residential occupation will only be on the sixth floor and higher, thereby reducing exposure to high pollutant concentrations.

98 The proposals include the preparation of 'Residential' and 'Framework Workplace' (for the B1 office space) Travel Plans. As incorporated within these Travel Plans, the scheme will ensure that 20% of all car parking spaces have electric charging points, with an additional 20% passive provision for electric vehicles.

99 The proposed development is better than air quality neutral in terms of building emissions but is not air quality neutral in terms of transport emissions. As the proposed development is not air quality neutral for transport emissions, as stated in the Environmental Statement chapter, the applicant should discuss additional mitigation measures with the Council.

Transport

100 A comprehensive TfL response was sent to Hounslow Council on 27th January 2016 identifying a number of issues that will need to be resolved before the application is determined. Some initial feedback has been received prior to a planned meeting and it is understood that the applicant is preparing a more comprehensive written response. The following comments provide a summary of TfL's concerns.

Trip generation

101 Although there is a 2002 extant permission for the 'Citadel' scheme, the site has been vacant for a number of years and is therefore not currently generating any trips. In accordance with TfL's Best Practice Guidance, TfL advised the applicant that the Transport Assessment (TA) should set out the impact of the development against the measured number of trips that the existing site is generating at the time of the application. This ensures that the transport impact of the development can be quantified relative to existing conditions. The net impact compared to the extant 'Citadel' scheme was presented for reference only. The resulting trip generation is considered to be robust and enables TfL to understand the impact of this proposal at this strategic point in the transport network where any small impact might be an issue on an already congested network.

Highway assessment

102 A PICADY assessment of the Larch Drive access has been conducted which indicates that there is reserve capacity at the junction. However, of greater concern to TfL is the strategic highway network surrounding the site which is operating very close to capacity. Although the assessment only shows relatively low percentage increases in flows through the roundabout in the peak hours (1.47% in AM peak and 1.63% in PM peak), the surrounding network will be sensitive to any absolute increase in trips. Chiswick roundabout already operates at capacity and it is likely that this small increase will mean that queues on the approaches will increase. Bus journey times would also be affected by an increase in overall flow and queue lengths on approaches.

103 Trip generation from other committed developments is, however, quite low and will be gradual so it should be possible to mitigate those as traffic levels and network operation evolve. As set out in the TA, traffic flows have fallen in recent years (from 35,958 in 2000 to 26,141 in 2014 on Chiswick High Road to the west of Chiswick Roundabout), and have remained fairly constant for the last 3 years, suggesting that with suitable mitigation, such as revised signal timings, the slightly higher flow as a result of the development could be accommodated. Further traffic impact assessment and modelling will need to be carried out in connection with any approvals required for works affecting the TLRN.

Public transport impact

104 The site is served by several high frequency routes and although it is located at the busiest point on these routes, the net impact of the development trips is not expected to be significant. Bus stops in the vicinity of the site were audited as part of a PERS (pedestrian environment review system) audit and some deficiencies were identified. TfL expects mitigation to rectify these deficiencies to be secured through section 106/CIL.

105 Gunnersbury station is extremely busy, suffering capacity constraints in the AM peak. The assessment indicates that there could be an additional 50 departures and 38 arrivals in the AM peak using Gunnersbury station. Because there is no spare station capacity to accommodate any increase in peak trips and there are no schemes to address this in the short term, additional peak time management measures may be required to ensure that the station can continue to operate safely. The potential to secure financial contributions through CIL from developments that generate additional trips at Gunnersbury Station, is an issue that will require further discussion between the applicant, TfL and Hounslow transport officers.

Public realm, access and pedestrian routes

106 One vehicular access is proposed from Larch Drive. It is understood that this would operate as a left in, left out, in accordance with the extant permissions and this should be secured by condition. A loading bay on Larch Drive is also proposed for delivery and servicing vehicles. The detailed design of the access and servicing will need to be submitted to TfL and subject to approval as part of the section 278 agreement. Direct cycle access will be provided separately via dedicated lifts to the cycle stores; while pedestrian accesses will be provided at various points around the site.

107 The site surroundings are hostile for pedestrians and cyclists due to the dominating road infrastructure which also creates barriers to movement. The applicant is proposing public realm improvements around the site which would need to be delivered through a section 278 agreement with TfL. Although improvements to Larch Drive have the potential to enhance the setting of the development, further details will need to be submitted to TfL to ensure that the improvements deliver real benefits and do not compromise safety, while conforming to guidance. Changes to pedestrian and cycle routes along the site frontages to Great West Road and North Circular Road are also proposed. TfL will need to agree the details of all these changes with the applicant which will also require formal approval through the section 278 agreement.

108 Other improvements should be considered to link pedestrians and cyclists from the development into other proposed improvements such as those on Kew Bridge Road. This should include improvements to enhance the visibility of the signal equipment outside the petrol station on the A4 Great West Road to mitigate the existing road safety issue highlighted in the PERS audit.

109 As part of its comprehensive response to the Council, TfL has outlined a large number of concerns about proposals for the public realm and landscaping based on the Design and Access Statement and submitted plans. These concerns relate to walking and cycling routes, road safety, turning movements, future management and maintenance, use of materials, paving, planting and lighting. The TfL response should be referred to for details of these concerns which will need to be addressed before the application is determined. A meeting to discuss these issues is being arranged and TfL understands that a comprehensive written response is being prepared. A number of proposals affecting highways and the public realm will need separate approvals from TfL in its role as manager of the TLRN.

Cycling

110 484 cycle parking spaces are proposed for the residential development, 62 spaces for the office accommodation and 2 spaces for the cafe use. This level of provision will meet London Plan requirements and TfL is pleased to note that it will also be made for adapted cycles. Internal long stay cycle parking will take the form of double stackers. Although this is acceptable, TfL recommends that mechanical or pneumatic assisted lifting is provided to access the upper level. Internal cycle parking will be reached by dedicated lifts leading to the basement levels. External short stay parking will be provided in the form of Sheffield stands.

111 It is recommended that cycle parking for the different land uses should be kept separate for reasons of security. For commercial uses showering and changing facilities will need to be provided in convenient locations. Confirmation is required that access to cycle parking will comply with guidance in Chapter 8 of the London Cycle Design Standards, <http://content.tfl.gov.uk/lcds-chapter8-cycleparking.pdf>.

112 TfL is developing proposals for cycle and pedestrian improvements on Kew Bridge Road. These will extend between Wellesley Road / Kew Bridge Road to just west of the Kew Bridge / Kew Bridge Road junction. The scheme should provide improved access from the development to Kew Bridge station reducing the number of crossing points for pedestrians from 4 to 2 at the Kew Bridge / Kew Bridge Road junction and improving cycle journeys through the junction. The scheme should address some of the deficiencies noted in the PERS audit and will improve conditions for cyclists. The TA acknowledges that the improvements are not fully funded and so CIL/S106 could be used as part funding. TfL will therefore be seeking section 106 funding or CIL which is ring fenced towards these improvements.

Car parking

113 A total of 82 car parking spaces are proposed comprising 72 spaces allocated to the 320 residential units and 8 spaces for the office development. In addition there will be 2 car club bays. The overall level of parking is acceptable to TfL taking into account the site's public transport access. The TA claims that 95% of the parking spaces will be DDA compliant because they will be provided using an automated stacker system. Details of how this would work have been provided in the TA appendices but its day to day operation and management, including allocation of spaces, management of queuing and the priority given to Blue Badge holders will need to be detailed in a car park management plan (CPMP) which will need to be secured by condition.

114 As part of the car parking provision 18 electric vehicle charging points will be provided allowing a total of 36 vehicles to be charged over a 24 hour period. The provision of electric vehicle charging will meet the London Plan requirement, which is welcomed and should be secured by condition.

Travel planning

115 A framework travel plan for the B1 office use and a full travel plan for the residential use have been submitted in support of the application. Both plans have been assessed using the ATTrBuTE tool and have passed.

Delivery and servicing

116 As stated above, a loading bay has been incorporated into the design of the development on the Larch Drive frontage, which is welcomed. TfL understands that there will be a fully managed system for receiving deliveries and for the collection of waste and recycling. Some initial details of delivery and servicing have been submitted as part of the TA. A full Delivery and Servicing Plan (DSP) will need to be submitted and agreed by TfL and Hounslow Council and secured by condition. This should confirm the number and timing of deliveries expected and how deliveries will be managed to minimise the impact of freight movements on the transport network. The DSP should be prepared in accordance with TfL guidance <http://content.tfl.gov.uk/delivery-and-servicing-plans.pdf>.

Construction logistics plan

117 A draft Construction Logistics Plan (CLP) has been submitted in support of the application. It is important that the full CLP and associated Traffic Management Plan is developed in collaboration with TfL. Reference is made in the draft document to liaison with the local highway authority but this needs to be extended to include TfL (highway authority for the A4, A406 and Larch Drive) and Highways England who manage the M4. The final CLP will need to be submitted for approval and agreed by TfL and the Council prior to commencement. This should be prepared in accordance with TfL guidance <https://tfl.gov.uk/info-for/freight/planning/construction-logistics-plans>.

118 The site's location surrounded by TLRN means that TfL is particularly interested in the applicant's construction plans and requests further discussion on this matter. The site is constrained by both the site footprint and limited roadspace. The impact of piling to create basement parking on highway structures will need to be fully considered.

119 Due to the sensitive location temporary lane closures and any other measures that disrupted traffic flow could only be allowed at night. Compensation may be required for any disruption. It is unclear from the text why the pedestrian route/footpath alongside the A4 will need to be suspended as shown in the plan in appendix 1 to the draft CLP. A clear justification would need to be provided for any alterations to pedestrian or cycle routes and any disruption to road users should be minimised. The document refers to hours of operation and the need to protect residential amenity. However, given the site's location surrounded by major strategic roads which are heavily congested it would be advisable to restrict construction vehicle arrivals and departures to off peak periods including at night.

120 It is understood that the applicant is looking at securing a holding site on the adjacent B&Q site which would be helpful in reducing the impact on the highway network. This is not referenced in the draft CLP. Given the high levels of development and construction in the area, the CLP should also include commitments to working with other nearby contractors, including those working on the Brentford Community Stadium (BCS) development, to manage, co-ordinate and minimise impact of these activities on the transport network.

Digital advertising and oversailing

121 TfL understands that the applicant is proposing four digital advertising screens on the exterior of the development which will show static images. Given the site's location surrounded by TLRN, TfL will need to apply vigorous tests and refer to the latest guidance such as that from the Institute of Lighting Professionals to ensure that advertisements visible from the TLRN do not pose a risk to road safety. Proposed advertising must not be distracting to drivers.

122 The ES identifies a moderate to major adverse impact in terms of glare for drivers approaching the site from viewpoint 6 in the west as a result of the proposed digital advertising. This could adversely affect drivers and have an impact on road safety on the A4 Great West Road and/or the M4 motorway and is unlikely to be acceptable. It is understood that Highways England has also been informed.

123 It appears that at least one of the proposed advert screens also extends beyond the land ownership boundary and oversails the footway adjacent to the A4/Larch Drive. The proposals for digital advertising have not previously been discussed with TfL or Highways England and so a meeting will be required to discuss the implications for road safety and management of the road network before any agreement in principle can be provided by the relevant authorities.

124 TfL also requires further information on any other parts of the proposed development that oversail the ownership boundary onto highway land. Generally oversailing should be avoided. Issues of safety will need to be considered if parts of the building oversail the highway or footway. TfL will need to understand the implications for management of the TLRN before any in principle agreement can be provided. If the proposals are agreed in principle, a licence under section 177 of the Highways Act will be required.

Community Infrastructure Levy

125 The Mayor of London introduced his Community Infrastructure Levy (CIL) on 1 April 2012. Most development that receives planning permission after this date is liable to pay this CIL. The proposed development is in the London Borough of Hounslow, where the charging rate is £35 per square metre of floorspace. Further details can be found at:
<http://www.london.gov.uk/publication/mayoral-community-infrastructure-levy>

126 LB Hounslow's CIL Charging Schedule came into effect from July 2015. Transport mitigation measures at Chiswick roundabout, Gunnersbury station and improvements to the wider public realm including pedestrian and cycle facilities, wayfinding and bus stops will need to be secured through section 106 or ring fenced CIL.

Local planning authority's position

127 The Council has not set a date to report the application to Planning Committee and the application remains under consideration.

Legal considerations

128 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

129 There are no financial considerations at this stage.

Conclusion

130 London Plan policies on housing, design, climate change and transport are relevant to this application. The application broadly complies with the London Plan however, further information and/or confirmation, as detailed below is required to comply fully.

- **Housing:** Details of the independent assessment of the applicant's viability appraisal should be shared to demonstrate that the maximum reasonable amount of affordable housing has been achieved. Further discussion is required on the appropriate tenure mix of the development. Confirmation that the housing mix meets local needs should be provided. The principle of a high density development is acceptable subject to the highest quality design. The residential quality and play space provision is in accordance with the Mayor's guidance.
- **Design:** The design and height of the development could potentially be supported subject to further information relating to public realm and detailed design and architecture. The views analysis demonstrates that the impact of the development could result in harm to heritage assets but further information is required to identify the degree of harm. If the harm is less than substantial it must nonetheless be given considerable importance and weight when assessing that harm against any public benefits delivered by the proposals. Further information and discussion is required to fully understand the impact of the development upon Kew Garden World Heritage Site in particular.
- **Climate change:** Overall a reduction of 178 tonnes of CO₂ per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 34%. The on-site carbon dioxide savings fall short of the targets within Policy 5.2 of the London Plan and short fall of 5.8 tonnes of CO₂ per annum should be met off-site.
- **Transport:** The development is in accordance with the London Plan in terms of car and cycle parking. TfL have identified a number of issues relating to public realm oversailing which should be addressed. Conditions and a s106 legal agreement will be required to secure matters raised within this report and ensure that the development fully accords with the London Plan.

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