

# Hounslow Civic Centre site, Lampton Road

in the London Borough of Hounslow

planning application no. P/2015/5505

## 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

Hybrid application for demolition of existing buildings, and permission for: 178 residential dwellings (C3 use), flexible uses including retail (A1 use) or cafe (A3 use) or community centre (D1 use), car parking, public space, landscaping and associated works (in detail); and, up to 762 residential dwellings (C3 use) and associated car parking, public space, landscaping and associated works, with all matters to be reserved except means of access (in outline). The proposal includes buildings of up to nine-storeys.

## The applicant

The applicant is **Notting Hill Housing Trust**, and the architect is **Allies and Morrison**.

## Strategic issues

The proposed **residential-led redevelopment** would significantly **increase housing supply** in the **Hounslow Housing Zone**, and is **strongly supported** in strategic planning terms.

Hounslow Council and the applicant should, nevertheless, ensure that the matters raised in this report with respect to **housing, inclusive access, sustainable development** and **transport** are addressed prior to the Mayor's decision making stage.

## Recommendation

That Hounslow Council be advised that whilst the scheme is broadly supported in strategic planning terms the application does not yet fully comply with the London Plan for the reasons set out in paragraph 67 of this report. The resolution of those matters could, nevertheless, lead to the application becoming compliant with the London Plan.

## Context

1 On 25 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 26 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 the following categories of the Schedule to the Order 2008:

- 1A 1. *“Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats”*; and,
- 1C 1.(c) *“Development which comprises or includes the erection of a building of... 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 (as amended) 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](http://www.london.gov.uk).

## **Site description**

6 The Hounslow Civic Centre site (5.3 hectares) is located on the edge of Lampton Park, within a 10 minute walk of Hounslow town centre. The site is bounded to the east by Lampton Road and suburban residential hinterland, Lampton School to the north; school playing fields to the west; and, the 40-acre Lampton Park to the south.

7 The site is currently occupied by the London Borough of Hounslow Civic Centre - which comprises various components including a principal two-storey building completed in 1975; a Victorian villa at 88 Lampton Road; and, a multi-storey car park. Just outside the red line, at the northeast boundary of the site, is a late Georgian house ‘The Lawn’ which is Grade II Listed.

8 The Lampton Road site is located approximately 300 metres from Hounslow Central Underground station - which is served by Piccadilly line services towards central London, Harrow and Uxbridge, and Heathrow Airport. The site is served directly by two bus routes: H20 (which terminates at the site and provides services towards Twickenham); and, 120 (which operates between Hounslow and Northolt). Further bus services to a variety of destinations can be accessed in Hounslow town centre. Hounslow mainline station, offering rail services to London Waterloo is located approximately 1.3 kilometres from the site. Overall, the site registers a Public Transport Accessibility Level (PTAL) of three, on a scale of one to six(b), where six denotes the most accessible locations in the capital.

## **Details of the proposal**

9 The proposal is for comprehensive redevelopment (part detailed, part outline) of the existing Hounslow Council civic centre site for up to 940 new homes (in buildings of up to nine-stories), retail/cafe, community centre and associated public space, landscaping and car parking.

10 This application has been submitted in tandem with application P/2015/5418 for a new civic centre building south of this site, at Bath Road, within Hounslow town centre (refer to GLA planning report D&P/3798/01).

## Case history

11 On 12 November 2015 a pre-planning application meeting was held at City Hall to discuss this proposal. The advice issued by GLA officers stated that the proposed residential-led redevelopment of this site is strongly supported in strategic planning terms, and that the emerging masterplan is well-designed, and would deliver a scheme that optimises development potential and increases housing supply in accordance with London Plan policies 3.3 and 3.4. The applicant was, nevertheless, advised to ensure that the submitted application addresses various detailed matters with respect to: housing; urban design; inclusive access; sustainable development; and, transport.

## Strategic planning issues and relevant policies and guidance

12 The relevant issues and corresponding policies are as follows:

- Housing *London Plan; Housing SPG; draft Interim Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; draft Shaping Neighbourhoods: Character and Context SPG;*
- Affordable housing *London Plan; Housing SPG; draft Interim Housing SPG; Housing Strategy;*
- Density *London Plan; Housing SPG; draft Interim Housing SPG;*
- Urban design *London Plan; draft Shaping Neighbourhoods: Character and Context SPG; Housing SPG; draft Interim Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG;*
- Inclusive access *London Plan; Accessible London: achieving an inclusive environment SPG;*
- Sustainable development *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; Mayor's Ambient Noise Strategy;*
- Transport and parking *London Plan; the Mayor's Transport Strategy;*
- Crossrail *London Plan; and, Mayoral Community Infrastructure Levy.*

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 2015 Hounslow Local Plan; and, the 2015 London Plan (Consolidated with Alterations since 2011).

14 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; and,
- Hounslow Planning Brief for Civic Centre Site, Lampton Road.

## Principle of development

15 In recognition of latent housing capacity at this site (as identified by the London Plan Strategic Housing Land Availability Assessment), the Hounslow Local Plan allocates the Civic Centre campus for residential-led redevelopment - subject to the appropriate re-provision of Council office space (either on-site, or closer to Hounslow town centre).

16 As discussed in paragraph 10, the applicant has submitted this scheme in tandem with application P/2015/5418 for a replacement civic centre building within Hounslow town centre (refer to GLA planning report D&P/3798/01). It is understood that, subject to planning permission, work on the replacement civic centre could start during the summer of 2016. Moreover, based on discussions at pre-application stage, it is evident that the proposed phasing approach across the two sites would allow for the timely commencement of both schemes, and a practical transition and transfer of civic functions to the new town centre site. Hounslow Council is expected to appropriately secure detailed approval of the phasing strategy, as well as any necessary linkages between this proposed development and that for the new Civic Centre at Bath Road, as part of any planning permissions for these schemes.

17 Accordingly, GLA officers strongly support the proposed residential-led redevelopment of the Hounslow civic centre site in strategic planning terms.

## Housing

18 This site forms part of the Hounslow Housing Zone, which is prioritised for accelerated housing delivery with GLA funding support. The hybrid (part detailed, part outline) proposal seeks permission for up to 940 units at this site. This is equivalent to 11% of the London Borough of Hounslow's housing target up to 2024/25. As discussed above, the proposed residential-led redevelopment at this site is strongly supported in accordance with London Plan Policy 3.3.

19 Whilst detailed permission is sought for 178 units, the majority of the scheme has been submitted in outline, meaning that there is a degree of flexibility in terms of the exact number of units that could ultimately be delivered across the wider masterplan. Nevertheless, as a benchmark for assessment purposes, the applicant has presented an illustrative residential mix for 919 units in total. The illustrative mix is presented in table 1 below, and this will be a material consideration in the event that reserved matters applications are made for future detailed phases.

Unit typology	Private market	Intermediate	Affordable rent	Total
One-bedroom	207	109	11	327
Two-bedroom	209	148	27	384
Three-bedroom	135	21	52	208
<b>Total</b>	<b>551</b>	<b>278</b>	<b>90</b>	<b>919</b>

**Table 1:** Illustrative residential schedule for the hybrid application.

20 Based on the above, the scheme would achieve an affordable housing provision of 40% overall (24% affordable rent and 76% intermediate). Of the affordable rented accommodation, 58% would be family sized.

21 The proposed overall provision of affordable housing accords with the strategic target within the Hounslow Local Plan and is strongly supported. GLA officers also particularly welcome the prioritisation of family sized units within the affordable rent component of the housing schedule. Having regard to the submitted affordable housing statement, GLA officers acknowledge how the nature of the affordable offer has been optimised in this case - in response to policy requirements and issues of financial viability. Moreover, having regard to the requirements of London Plan Policy 3.12, and the characteristics of the site and the context more generally, GLA officers are satisfied that 40% represents the maximum reasonable amount of on-site affordable housing as a proportion of the housing mix. However, noting that the proposed balance of affordable housing is weighted heavily towards the intermediate tenure, GLA officers have sought further discussion on the tenure split, and specifically, whether the provision of affordable rent units may be increased for latter phases of the development in response to the objectives of London Plan Policy 3.11.

22 To this end, and in line with GLA pre-application advice, the applicant team has been working with Hounslow Council to develop a mechanism for upward review of on-site affordable rent units (through the conversion of intermediate units) where scheme viability improves in future. This approach is strongly encouraged, and GLA officers expect the mechanism to be identified as a planning obligation of this scheme, and secured by way of Section 106 legal agreement accordingly.

#### Residential mix and housing standards

23 GLA officers support the proposed balance of dwelling typologies across the proposed tenures (particularly the 58% provision of family sized affordable rented housing). Furthermore, a review of the proposed detailed residential layouts (and illustrative layouts for the outline component) confirms that these would be well-proportioned dwellings that comply with London Plan minimum space standards and respond well to the design quality benchmarks established within the Mayor's Housing SPG. The applicant has also confirmed its commitment to ensure that all units would meet Building Regulations standards M4(2)/M4(3) as per the Mayor's proposed minor alterations to London Plan Policy 3.8. This is supported and the Council is advised to include planning conditions to secure these standards accordingly.

#### Children's play space

24 Based on the methodology within the Mayor's Play and Informal Recreation SPG, the illustrative masterplan would generate a requirement for 2,240 sq.m. of children's play space. In response, the scheme proposes 6,700 sq.m. of playable green spaces within the public realm, and a minimum of 3,500 sq.m. of residential amenity space within private courtyards. The play strategy promotes the flexible use of open spaces by all groups, with incidental play features dispersed and incorporated within the public realm. This approach is supported, and the proposed provision would significantly exceed the spatial requirement generated by the SPG. Moreover, it is noted that Lampton Park (adjacent to the site) would offer numerous additional recreation opportunities for older children within the scheme. Accordingly, GLA officers are satisfied that the application accords with London Plan Policy 3.6.

#### Residential density

25 The existing Hounslow Civic Centre essentially provides a public function of 'central' characteristics. However, the nature of its setting (300 metres from the edge of Hounslow town centre) is principally suburban in character. Noting the Public Transport Accessibility Level (refer to paragraph 8), the London Plan density matrix would typically suggest a density range of 150 to 250 habitable rooms per hectare for a context such as this. Notwithstanding this, the London Plan and Mayor's Housing SPG acknowledge the potential for large development sites to define their own character.

26 The submitted design and access statement confirms that the residential density of the illustrative masterplan is 506 habitable rooms per hectare. Therefore, the masterplan would considerably exceed the density range typically expected for a context such as this. However, noting the size of the site (5.3 hectares), the particular characteristics of the setting (including PTAL), and the design response to context (refer to the urban design section below), GLA officers strongly support the proposal to deliver higher densities at this site as part of a well-designed scheme that would optimise development potential and increase housing supply in accordance with London Plan policies 3.3 and 3.4.

## Social infrastructure

27 London Plan Policy 3.7 states that large residential developments should, where necessary, coordinate the provision of social, environmental and other infrastructure. Given the quantum of residential development proposed in this case, it will be important that the scheme appropriately contributes towards the infrastructure necessary to support sustainable communities. Hounslow Council is ultimately best placed to identify the relevant response in this regard, and GLA officers expect an appropriate contribution to be secured through the Hounslow Community Infrastructure Levy (and by way of planning obligation, in addition, if necessary).

## **Urban design**

28 The design of the outline masterplan responds well to the core principles of the Hounslow Council Civic Centre Site planning brief, and, beyond the first detailed phase, GLA officers welcome the fact that the submitted design and access statement contains high quality design guidance for the outline component of the scheme (addressing areas such as: residential design, appearance, access and entrances, street design, parking and servicing).

29 GLA offices are of the view that the masterplan layout is well considered, and would provide a clear and legible network of public routes and open spaces (carefully aligned with the existing street network). Furthermore, the layout of the proposed residential blocks (of varying scale and typology) provides clear delineation between public and private realm, and allows the masterplan to respond to the context at site edges, whilst introducing new character areas within the scheme. These design principles are strongly supported.

30 The proposed perimeter block layout would provide improved definition and passive surveillance at the site boundaries – particularly enhancing the interface between the site and open space at Lampton Park to the west. To the east the scheme would sensitively incorporate 88 Lampton Road as part of a new residential neighbourhood, whilst maintaining the landscaped character to the west of Lampton Road through the provision of a linear green space.

31 The approach to building form, scale and massing has been developed having regard to the various characteristics of the site edges and surrounding townscape – including the suburban residential context and historic buildings to the east; and, the opportunity to provide an improved frontage onto Lampton Park to the west. GLA officers are of the view that the arrangement of building mass (including buildings of up to nine-storeys towards the west of the site) supports the legibility and characterisation of the masterplan; provides a better defined (and more active) frontage onto the park; and, optimises development potential. Moreover, the arrangement also ensures that good levels of daylight would penetrate into the proposed residential courtyards and amenity spaces.

32 Further to a review of the townscape assessment and visual impact study, and having had special regard to the desirability of preserving Listed Buildings, their settings and any features of special architectural or historic interest which they possess, GLA officers are of the view that the proposal would provide an appropriate response to context. In particular, officers are of the opinion that the proposed landscaping at the Lampton Road frontage, coupled with the replacement of the multi-storey car park with high quality mansion flats, would significantly enhance the setting of The Lawn (Grade II). Furthermore, whilst the proposed development would result in a noticeable change at the interface between the site and Lampton Park, as discussed above, GLA officers support the proposed response which would provide a better defined (and more active) frontage onto the park.

33 With respect to the residential blocks, the applicant proposes range of typologies including mews houses, maisonettes, mansion blocks and apartment blocks. The detailed plans and illustrative outline layouts indicate that a high quality of residential accommodation could be achieved across the scheme - with optimised floorplate depths to allow for good levels of sunlight/daylight penetration, and a good distribution of cores to minimise unit to core ratios. The detailed plans and design guidance also demonstrates that the ground floor of blocks would be well activated by residential entrances. This is strongly supported, and would contribute to good levels of street-based activity, passive surveillance and a sense of ownership for future residents. The applicant's commitment to achieve a high proportion of dual aspect units (through measures such as the provision of deck access to north/south orientated blocks) is equally supported.

34 The proposed architectural treatment for the scheme comprises the extensive use of brick as a facing material, combined with well-proportioned window and door openings, with deep reveals. The proposal to use varying tones of brick and simple high quality detailing to differentiate between residential typologies is supported, and will help to reinforce masterplan character areas and local identity.

## **Inclusive access**

35 The applicant has set out its response to access and inclusion within the design and access statement. GLA officers support the commitment to ensure equal and convenient access throughout the development, and, in particular, note that the applicant has given careful consideration to the opportunities and constraints associated with the proposed conversion of 88 Lampton Road to commercial/community use.

36 Based on the detailed drawings, and the design principles for the outline component of the scheme, it is evident that building entrances across the masterplan would be legible, accessible and uncluttered. Internal layouts also demonstrate that detailed blocks are well resolved - with circulation routes generously proportioned and well laid out. The typical unit layouts provided also demonstrate that relevant wheelchair standards could be achieved as required by London Plan Policy 3.8.

37 With respect to the public realm, the landscaping plans confirm that routes through the masterplan would be legible and generous, and that gradients would be well-handled. Shared surfaces are proposed in certain instances to create home zone areas. This is supported in principle, however, whilst the submitted design guidance refers to the use of contrasting materials as a means of delineation, GLA officers seek to ensure that areas of shared surface, and pedestrian safe zones, are clearly identified by tactile (as well as visual) boundaries. Accordingly the Council is encouraged to secure approval of these landscaping details by way of planning condition.

38 As was discussed at pre-application stage, it is noted that the proposed provision of Blue Badge parking spaces (10% as a proportion of overall car parking) would result in a shortfall relative to the proposed number of wheelchair accessible/adaptable units. Whilst an initial under provision of Blue Badge spaces for adaptable homes would not raise an objection in principle, GLA officers ultimately seek to ensure that provision would be capable of responding to demand over time (refer to the transport section below).

## **Sustainable development**

### Energy strategy

39 For the purposes of assessing applications against the carbon dioxide savings target within London Plan Policy 5.2, the Mayor now applies a 35% reduction target beyond Part L

2013 of Building Regulations. In accordance with the principles of Policy 5.2 the applicant has submitted an energy statement for the proposed scheme, setting out how the development proposes to reduce carbon dioxide emissions. In summary the proposed strategy comprises: energy efficiency measures (comprising a range of passive design features and demand reduction measures); and, a site-wide network driven by combined heat and power plant (CHP) and capable of connection to a district heating network in future. The energy statement indicates that the strategy would achieve the 35% target. This carbon dioxide saving is supported in principle. However, GLA officers are seeking a number of detailed clarifications from the applicant team, particularly with respect to the carbon dioxide savings attributed to the proposed CHP. GLA officers will provide an update at the Mayor's decision making stage, following the conclusion of these discussions.

### Climate change adaptation

40 The proposed landscaping strategy offers various opportunities for urban greening and biodiversity measures in accordance with London Plan policies 5.10, 5.11 and 7.19. These include planting and landscaping within the public realm, as well as biodiverse initiatives including green and brown roof provision. These proposals, and the various sustainable urban drainage measures identified within the submitted flood risk assessment, are strongly supported. In accordance with London Plan policies 5.10, 5.11 and 5.13 the Council is encouraged to secure detailed approval of these climate change adaptation measures by way of planning condition.

## **Transport**

### Site access

41 There are currently two vehicular accesses to the site; one from Clovelly Road in the south and one to the main Civic Centre in the north. Three vehicular accesses are proposed from Lampton Road, utilising the two existing accesses, plus an additional central access. The northern access is proposed to be two-way and the central and southern accesses to be one way only, 'in' and 'out' respectively. TfL understands that this arrangement has the aim of keeping traffic flows within the site low, to allow for sufficient visibility at all accesses, and is also the preference of Hounslow Council.

42 Junction modelling has been carried out which indicates that the access junctions can operate satisfactorily in the end state, although this does not appear to take account of the peak demand point in 2018 - when 178 residential units will have been built while the civic centre remains operational. Following a request by officers, additional information is being provided to TfL to enable it to consider whether a sensitivity test of the 2018 scenario should be carried out.

43 The proposed central vehicular access for the masterplan will require the existing northbound bus stop on Lampton Road to be relocated to the south. Although TfL accepts that this relocation will be necessary, detailed designs for the relocated bus stop (including the exact positioning) will need to be reviewed by TfL to ensure that it complies with relevant guidance, and minimises any impact on bus journey times, passengers or road safety. Detailed designs for any relocated bus infrastructure will need to be formally approved and this should be secured by condition. A meeting has recently taken place with TfL London Buses to confirm details of the bus stop relocation.

44 The applicant also proposes re-locating the existing H20 bus stand on site (it is also proposed that the stand will jointly serve as a bus stop). The proposal would route the bus in via the central entrance and out via the southern entrance with the bus stand located adjacent to



88 Lampton Road. This negates the need for a bus loop at the northern access. Whilst bus tracking has been carried out based on an 8.8 by 2.4 metre vehicle, there is a possibility that larger vehicles may be required to use this route in future. TfL has therefore requested tracking for a larger 10.8 by 2.5 metre vehicle. Officers understand that this is currently being prepared by the applicant team, for review by TfL.

45 It is noted that the road containing the bus stand will also accommodate service vehicles and the swept path analysis appears to show that service vehicles will not be able to overtake while a bus is in the stand. Again this should be addressed when the revised tracking drawing is provided.

46 Within the site there will be a mix of adopted and private roads. Under current proposals TfL understands that the re-located bus stand will be on adopted highway; this will need to be confirmed and secured as part of the application. TfL's strong preference is for all bus routes and bus infrastructure to be on adopted highway.

#### Trip generation and impact assessment

47 Traffic surveys in and around the site access have been used to establish baseline trip generation and compared with the output from TRICS surveys to establish net trip generation. Growth factors have been applied but (noting nearby Opportunity Areas such as Heathrow and Housing Zones which include Hounslow town centre), it is not currently clear whether these fully reflect development related growth assumed by the London Plan. More information on this is currently being provided to TfL.

48 The net trip generation presented in the transport assessment indicates a reduction in vehicle trips by 2022 although there is anticipated to be an increase in pedestrian and bus trips. Although modelling of the site access junctions has been carried out, there has been no area wide assessment. All modelling has been carried out for a 2015 baseline and a 2022 end state. However, the application is a hybrid and the detailed application for 178 residential units will be built out by 2018 while the civic centre remains operational. As stated above, TfL has requested that a further test of 2018 be carried out to represent a worst case scenario including the identified cumulative developments which would extend beyond the site access junctions to assess impacts on the surrounding network including the double mini roundabout at the junction of Spring Grove Road and the main junction with Great West Road which is part of the Transport for London Road Network (TLRN). In response to TfL's initial comments more information will be provided on the net vehicle trip generation in 2018 – which will enable TfL to assess whether any additional assessment or modelling is required.

49 The relocation of the civic centre to the proposed town centre location combined with the substantial reduction in staff parking has the potential to significantly change bus use patterns in the area. The net trip generation by bus shows a substantial increase of 78 and 90 trips during the AM and PM peak respectively. Some of the methodology used in the transport assessment assumes an even distribution of passengers across all services, however, this may not be achieved in practice. Nevertheless, TfL has carried out its own capacity analysis and concluded that there is sufficient bus capacity to accommodate the increase in trips. As a result there is no requirement for bus capacity mitigation. Moreover, capacity issues are not envisaged on Underground services or at Hounslow Central as a result of the proposed development.

#### Car parking

50 The scheme includes 441 car parking spaces, plus two car club bays. This equates to a ratio of 0.48 spaces per unit. This is acceptable in the context of the site having moderate access

to public transport. In accordance with London Plan Policy 6.13, 20% of parking spaces will be fitted with active electric vehicle charging points and 20% will have passive provision.

51 Ten percent of car parking spaces will be designed for disabled users – as discussed in paragraph 38, this would result in a shortfall relative to the proposed number of wheelchair accessible/adaptable homes. Accordingly the parking management plan will need to respond to demand, and allow for future additional provision of Blue Badge spaces if required in future. The parking management plan will also need to set out the phasing and allocation of spaces, and controls on on-street parking. It has been agreed that the parking management plan will be secured by condition.

52 Given that not all surrounding roads are subject to parking controls, there is potential for overspill. Accordingly, TfL would expect the applicant to work with Hounslow Council to review the existing Controlled Parking Zones (CPZs) including times of operation and type of controls/eligibility as well as the need for potential CPZ extensions to cover unrestricted areas such as Lampton Road and roads within the site itself. It is understood that a site specific CPZ is proposed. CPZ controls on surrounding roads will be important to avoid any negative impact on existing residents or the surrounding highway network. Residents moving into the development should be exempt from eligibility for residents' parking permits and the developer should enter into a legal agreement with Hounslow Council to secure this.

53 Two car club spaces are proposed within the site, one located close to Lampton Road so that it can serve existing residents. An operator has been signed up and residents will be offered one year's free membership. This initiative is welcomed by TfL.

### Cycling

54 A total of 1,513 residents cycle parking spaces will be provided and a further 27 visitors spaces. This complies with the minimum London Plan standards. It is proposed that residents cycle parking will be a mixture of double stacker and Sheffield stands provided in clusters and located within the podium car parks. For double stacker parking it is important that mechanical or pneumatic assistance is provided to lift cycles onto the upper level. Provision should also be made for adapted cycles within the cycle parking design. Chapter 8 of the London Cycle Design Standards should be referred to in the design of cycle parking <http://content.tfl.gov.uk/lcds-chapter8-cycleparking.pdf>.

55 Proposals should be put forward to overcome any obstacles to cycling or to improve cycling infrastructure which would be secured by condition or a separate legal agreement.

### Walking

56 A PERS style audit has been carried out and summarised in the main body of the transport assessment. This indicated that most links and connections were of a good standard. Proposals should be put forward for improving any bus stops that do not currently meet full accessibility requirements which should be secured by condition or a separate legal agreement.

### Travel planning

57 A draft residential travel plan has been prepared and submitted with the application. It is proposed that each household will receive a £100 sustainability voucher that will allow them to choose between a variety of incentives including Oyster cards for public transport, cycle shop discounts or training as well as car rental. In addition new residents will be offered one year's

free membership of a car club. These initiatives are welcomed. A travel plan co-ordinator will also be appointed to oversee marketing and promotion of sustainable transport options.

#### Delivery and servicing plan (DSP)

58 Details of deliveries and servicing for both the commercial units and the residential development will need to be provided as part of a DSP. Provision should be made for off street servicing and home deliveries without compromising bus movements through the site. The potential conflict between servicing vehicles and use of the bus stand (as noted above) will also need to be resolved. The final DSP should be secured by condition, to be approved prior to first occupation and should be prepared in accordance with TfL guidance:

<http://content.tfl.gov.uk/delivery-and-servicing-plans.pdf>.

#### Construction logistics plan (CLP)

59 A framework construction management plan has been submitted as part of the transport assessment to provide an overview of anticipated construction activity. The development will be delivered in phases and phase one will be delivered alongside a fully occupied civic centre. The predicted vehicular trips generated by the concurrent office use and construction activity should be set out in the construction logistics plan (CLP).

60 The site will operate a delivery booking schedule to control deliveries. Potential conflict with Lampton School will need to be avoided, and timing restrictions may need to be put in place to avoid busy school arrival/departure times. TfL is pleased to note that the applicant will participate in the Fleet Operators' Recognition Scheme and will work within construction logistics and cyclist safety standards. The potential for use of a construction consolidation centre will also be investigated.

61 TfL guidance (<http://content.tfl.gov.uk/construction-logistics-plan-guidance-for-developers.pdf>) should be referred to in preparation of the final CLP which will need to be submitted in advance of works and secured by condition. The applicant has confirmed that a revised plan will be submitted for phase one prior to determination, with the CLP for phase two being secured by condition. It is important that bus services are not adversely affected during the construction period including continuity of use of bus stops and standing facilities.

### **Mayoral Community Infrastructure Levy**

62 In accordance with London Plan Policy 8.3, the Mayoral Community Infrastructure Levy (CIL) came into effect on 1 April 2012. All new developments that create 100 sq.m. or more additional floorspace are liable to pay the Mayoral CIL. The levy is charged at £35 per square metre of additional floor space in the London Borough of Hounslow.

### **Local planning authority's position**

63 Hounslow Council strongly supports this scheme in principle, and is expected to formally consider this application at a planning committee meeting in March 2016.

### **Legal considerations**

64 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.

65 In accordance with his statutory duty in section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 the Mayor shall have special regard to the desirability of preserving Listed Buildings, their settings and any features of special architectural or historic interest which they possess.

## Financial considerations

66 There are no financial considerations at this stage.

## Conclusion

67 London Plan policies on housing, urban design, inclusive access, sustainable development and transport are relevant to this application. Whilst the scheme is broadly supported in strategic planning terms, the application does not yet fully comply with the London Plan, as set out below:

- **Principle of development:** The proposed residential-led redevelopment of the Hounslow civic centre site would significantly increase housing supply, and is strongly supported in strategic planning terms.
- **Housing:** The illustrative housing schedule is broadly supported, and the hybrid masterplan presents a well-designed scheme that would optimise development potential within the Hounslow Housing Zone, and increase housing supply in accordance with London Plan policies 3.3 and 3.4. The proposed 40% provision of affordable housing is supported, however, GLA officers seek a Section 106 mechanism to allow for a proportional increase in on-site affordable rent units where scheme viability improves in future.
- **Urban design:** The hybrid masterplan is well considered, and allows the scheme to respond positively to the various contextual characteristics at the fringes of the site whilst optimising development potential within the heart of the proposed development. Accordingly the application complies with London Plan Policy 7.1.
- **Inclusive access:** The approach to access and inclusion is broadly supported in accordance with London Plan Policy 7.2. The Council is, nevertheless, encouraged to secure detailed approval of landscaping matters by way of planning condition.
- **Sustainable development:** The proposed energy strategy and climate change adaptation measures are broadly supported in strategic planning terms. Following the conclusion of discussions on the energy strategy, the Council is encouraged to secure associated energy and adaptation details by way of planning condition in accordance with London Plan policies 5.2, 5.10, 5.11, 5.13 and 7.19.
- **Transport:** Whilst the application is generally acceptable in strategic transport terms, the applicant should address the matters raised with respect to: site access; trip generation and impact assessment; car parking; cycling; walking; travel planning; delivery and servicing plan; and, construction logistics plan to ensure accordance with London Plan policies 6.3, 6.9, 6.10, 6.13 and 6.14.

68 The resolution of the issues above could lead to the application becoming compliant with the London Plan.

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